

UNITED STATES OF AMERICA
DEPARTMENT OF INTERIOR
LAND MANAGEMENT, PUBLIC HEARING

In the Matter of:

The Draft Suitability Report and Draft Environmental Impact Statement for the proposed Wilderness Designation of Instant Study Areas for the Arizona Strip District, Northern Mohave and Coconino Counties, Arizona, and Kane, Utah.

Room 220, Salt Palace
Salt Lake City, Utah
Monday, May 5, 1980

The Proceedings in the above-entitled matter came on for hearing, pursuant to notice, at 7:50 p.m.

BEFORE:

ROBERT MOELLER, Hearing Officer

APPEARANCES:

GLEN CARPENTER, Wilderness Coordinator, Arizona Strip District.
DENNIS CARTER, EIS Team Leader, Arizona Strip District.
LARRY ROYER, Wilderness Coordinator, Cedar City District.
BILL TEMPLETON, District Manager, Arizona Strip District.

For Accredited Free Lance Reporting Call...

DALE J.
JOHNSON
& ASSOCIATES

THOMAS A. BOWEN, JR., C.S.R. 406 BOSTON BUILDING
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HEARING OFFICER: Let the record show that this hearing was convened on May 5, 1980, at Salt Lake City, Utah, at the Salt Palace at Room 220 at 7:50 p.m.

Ladies and gentlemen, my name is Robert Moeller, and I'm an attorney for the Office of the Field Solicitor for the United States Department of the Interior, and I'd like to welcome you here today on the public hearing on the draft suitability report and draft environmental impact statement for the proposed wilderness designation of instant study areas for the Arizona Strip District, Northern Mohave and Coconino Counties, Arizona, and Kane County, Utah.

These hearings are being held pursuant to Section 3 D-1 C of the Wilderness Act of 1964, Section 603 of the Federal Land Policy and Management Act of 1976, and Section 1022 C of the National Environmental Policy Act of 1969.

The Bureau of Land Management is holding these public hearings to receive comments on the draft suitability report and draft environmental impact statement concerning the proposed wilderness designation of the instant study areas for the Arizona Strip District and Northern Mohave and Coconino Counties and Kane County,

Utah.

Comments received on the draft environmental impact statement and draft suitability report, whether written or oral, will be given equal consideration during the preparation of the final document.

If you wish to testify this evening, you can register in the back room, and they'll give me your name. Several of you have already registered. Please limit your testimony to no more than ten minutes. It appears, however, that we don't have that many people testifying, so if your testimony will go over, I think that's okay. I think we can be liberal in implementing the ten minute rule.

I'd like to present to you a panel of employees from the Bureau of Land Management here to receive your comments tonight. Their purpose here is to listen to your comments and to entertain questions of clarification regarding the draft statement. Since the purpose of the hearing is to hear your comments, questions dealing with the merits of the report are not really in order.

Let me introduce them to you now. There is Dennis Carter. He's the EIS Team Leader for the Arizona Strip District. Glen Carpenter is the Wilderness Coordinator for the Arizona Strip District. Larry Royer is the Wilderness Coordinator for the Cedar City District, and

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1 Bill Templaton is the District Manager of the Arizona
2 Strip District.

3 In addition to this hearing, there will be
4 several other hearings that are scheduled to be held,
5 and I would like to mention those additional hearings
6 and their dates. The next hearing will be held in the
7 Kanab Resource Area Office, Bureau of Land Management,
8 320 North First East, Kanab, Utah, on May 6, 1980. It's
9 at 7:30 p.m.

10 The next is at Saint George, Utah, at the
11 Four Season Convention Center, 747 East Saint George
12 Boulevard on May 7, 1980.

13 The next will be at Phoenix, Arizona, Maricopa
14 County Board of Supervisor's Auditorium, 111 South Third
15 Avenue, May 8, 1980. Those will all be held at 7:30 in
16 the evening.

17 In addition, the Bureau of Land Management has
18 scheduled two additional hearings. One will be in
19 Kingman, Arizona, in the English Building of Mohave
20 Community College, 1981 Jagersohn at 7:30 p.m., June 3,
21 1980. And the final one will be held in Flagstaff, Ariz-
22 ona, on June 4, 1980, at the Evergreen Motel, Greenery
23 Room, 1010 East Santa Fe.

24 The Bureau of Land Management is going to extend
25 the comment period on the draft documents until 30 days

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1 after the United States Geological Survey and Bureau of
2 Mines Mineral Report is made available to the public.
3 The date that that report is made available will be pub-
4 lished in the Federal Register.

5 In addition, if you do not wish to testify at
6 the hearing this evening, we would like to ask you to
7 submit written comments. They can be sent to the State
8 Director's Office, Bureau of Land Management, 2400 Valley
9 Bank Center, Phoenix, Arizona 85073. And as I say, the
10 record will be kept open 30 days after the U.S. Geological
11 Survey and Bureau of Mines Mineral Report is made available
12 to the public.

13 When you come up here to testify, please state
14 your name and if you are representing an organization,
15 please state the organization that you're representing.

16 Our first witness that is scheduled to testify
17 is Brian Beard, and he's representing the Utah Chapter of
18 the Sierra Club.

19 BRIAN BEARD

20 testifying on behalf of the Utah Chapter Sierra Club.

21 MR. BEARD: My name is Brian Beard, and I
22 reside at 93 East First South in Logan, Utah. I'm now
23 serving as the chairman of the Utah Sierra Club, and in
24 conjunction with the Arizona Chapter, commonly called the
25 Grand Canyon Chapter. We will combine a wilderness state-

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1 ment and submit that at a later date. Today we would just
2 like to focus on a few concerns we have with the EIS and
3 make a few, what I think, are helpful suggestions.

4 In Utah we have eight hundred plus Sierra Club
5 members who use the wilderness lands for spiritual, aes-
6 thetic, and scientific reasons. One of these is the Paria
7 Canyon primitive area. In the past the Sierra Club has
8 sponsored outings both nationally and state-wide and also
9 to Arizona. It is an important area to the people of
10 Utah and also the Utah Chapter.

11 We have a keen interest in seeing the area be
12 preserved. One of the things that makes the Paria Canyon
13 is the contoured scenic cliffs. The things that carve
14 them are the cyclic flash floods and rains of the area.
15 The Sierra Club is very interested and concerned in
16 preserving reserved water rights and in preserving natural
17 stream cycles of the river that carved the Paria Canyon.

18 We would like to see the EIS include a portion
19 on protection of reserved water rights, a section on
20 protection of wetlands as defined by recent executive
21 orders by President Carter, and a section on protection
22 of flood plain management. I think these sections could be
23 real short and should be included. Without these areas,
24 the very thing that has carved Paria will not be included.

25 That would be my statement for now, and we will

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1 be submitting detailed comments within the written comments
2 headline. Any questions?

3 HEARING OFFICER: Thank you, Mr. Beard.
4 The next witness is Floyd Stevens representing himself.
5 Mr. Stevens.

6 FLOYD STEVENS

7 testifying on behalf of himself.

8 MR. STEVENS: My name is Floyd Stevens, and
9 I'm a student at the University of Utah. I requested
10 time to ask some questions concerning this, and looking
11 over the draft, I find that there is just a very small sec-
12 tion on the Navaho application. I would like to know what
13 kind of effect this will have on the Navaho application
14 if any, and then also to know if the Navaho tribe has
15 made any requests or made any input into your draft report
16 and statement.

17 MR. CARTER: Dennis Carter, Team Leader for the
18 environmental statement. Answer to the first question
19 would be more how would the Navaho application affect this.
20 It could take a portion. We'll have to defer how much of
21 that to Glen Carpenter here, but it would be the effect of
22 the Navaho application on this proposal.

23 MR. CARPENTER: I don't have the acreage figure.
24 My name is Glen Carpenter. I'm the Wilderness Coordinator
25 for the Arizona Strip. There will be an effort on the

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1 Navaho application. In the back portion of your copy of
2 the statement there in what's called the suitability
3 report -- actually it's in the last page -- this is covered
4 to some degree. It talks about the application and how
5 legislation is currently pending; that actually we have
6 two bills in the Senate that are currently pending that are
7 conflicting, and until this is resolved, there is really
8 little that we can do or know.

9 There is no impact that we can assess relative
10 to the Navaho application. Did that answer your question?

11 MR. STEVENS: No.

12 MR. CARPENTER: Could you restate your question
13 for me then, and I'll try to do better for you.

14 MR. STEVENS: As far as from what I've heard in
15 the past, the ELM is protecting the land and is discourag-
16 ing the Navaho purchasing the area around Ashrock Valley
17 and Paria Plateau, and you know, I just wanted to know if
18 this was taken into consideration or which has precedence
19 in this case.

20 MR. CARPENTER: Actually that question can't
21 be answered by us. That would have to be answered by
22 Congress, and it's their determination to make. We can
23 make recommendations, but in fact, the environmental
24 impact statement that was written for that application was
25 written by the Bureau of Indian Affairs, and the Bureau

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1 of Land Management really did not have a significant in-
2 put into the production of the environmental statement.

3 MR. STEVENS: So they prepared their own?

4 MR. CARPENTER: Yes.

5 MR. CARTER: Can you give us the second half?

6 MR. STEVENS: I was wondering how much input the
7 Navaho tribe had into this draft.

8 MR. CARTER: I'm not sure that they were con-
9 sulted. We did consult with the Kaibab Indians because
10 that is their traditional homeland. I don't know of any
11 consultation with the Navaho nation.

12 MR. TEMPLETON: The Navaho tribe was sent a letter
13 before we started the statement requesting that if they
14 wanted any input into it or any information, if they wanted
15 to be involved in this environmental process, that we were
16 holding scoping meetings and who they would contact and
17 all for their involvement in the State. We received no
18 response.

19 MR. ROYER: I'm Larry Royer of the Cedar City
20 ELM District. The Navaho Mohave Relocation Act does not
21 apply to Utah, and about one third of the suitability
22 proposal for suitability with recommendation involves
23 Utah land, so one third of that acreage is not involved
24 in the Navaho land application at all, because it's in
25 Utah.

10

1 HEARING OFFICER: Our next witness is Dick
2 Carter. Mr. Carter.

3 MR. CARTER: I'm going to defer my statement
4 to Bill Hargraves.

5 HEARING OFFICER: The next scheduled witness is
6 Mr. Bill Hargraves. Mr. Hargraves.

7 BILL HARGRAVES:

8 testifying on behalf of the Utah Wilderness Association.

9 MR. HARGRAVES: My name is Bill Hargraves. I
10 live at 1260 East 500 South in Salt Lake City. I'm
11 representing the Utah Wilderness Association and the
12 American Wilderness Alliance, and we'll submit a written
13 statement later. At this time I'd like to make a few
14 comments about some problems I see with the proposal.

15 The first, I like the color pictures in the
16 report. You don't see that from too many Government
17 publications. Even though I've been there, they
18 were still pretty nice. (Laughter)

19 The problems relate to defining outstanding,
20 which is an objective definition in regard to solitude
21 and primitive and unconfined recreation.

22 The EIS states regarding solitude in part of
23 the West Clark Bench, that "The upper park possesses
24 opportunity for solitude, but it cannot be considered out-
25 standing when compared to the canyons of Buckskin and

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3 1 Paria or the Cockscomb."

2 I don't feel that this type of comparative
3 definition of outstanding is appropriate when defining
4 wilderness suitability. That includes about 600 acres
5 of land which is north of the Dive area of Buckskin.

6 The southern area of the West Clark Bench was
7 also compared to the Dive and found lacking. This was
8 about 2500 acres. These were for solitude definitions.

9 The same reasoning was used to determine areas of
10 outstanding opportunity for primitive and unconfined
11 recreation. If an area did not possess the terrain associ-
12 ated with the Paria Canyons and the Dive and the Buckskin,
13 it did not possess outstanding opportunity for primitive
14 and unconfined recreation. This was the main criteria used.
15 If their canyons were not deep and narrow, then it did not
16 possess outstanding opportunity. I feel this definition
17 is inappropriate use.

18 Also, the same area north of the Dive and the
19 Buckskin were excluded for this reason also. The total
20 area here amounts to eight to ten thousand acres which
21 was eliminated from wilderness consideration on these
22 grounds which I feel are faulty.

23 I feel they should be added back into the propos-
24 al, at least reconsidered to the point of some other defini-
25 tion of outstanding possibly. Now, I'm not familiar with

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3 1 the part in Arizona section, so my comments at this time
2 will deal only with the Utah portion, which I've talked
3 about. And we will submit a written statement later.

4 MR. ROYER: Larry Royer from the Cedar City
5 District. The Utah portion did go through a formal
6 wilderness characteristics determination with public
7 comment period of June 10th through July 20, 1979, and
8 this determination decision of the Utah State Director
9 was that those areas did lack outstanding characteristics
10 that you mention, and that comment period will not be
11 opened again. There has been a formal decision on wilder-
12 ness characteristics on the Utah side of the Instant Study
13 Area.

14 MR. HARGRAVES: So that portion then is not in
15 question then?

16 MR. ROYER: What you see in the ES that you were
17 referring to is not part of the ES. It's an appendix to
18 the ES, and it is a reprint of the Wilderness Characteris-
19 tics Proposal that was made in 1979.

20 MR. HARGRAVES: In that case, all of the area in
21 Utah which was recommended, I guess, was kept in.

22 MR. ROYER: That's correct. The recommendation
23 that is in the appendix was the final decision. The
24 identical acreage, the map that is reprinted here, is
25 identical.

13

1 MR. HARGRAVES: In that case, I guess there is
2 nothing in my recommendation that will have any effect,
3 but I still don't like to see that reasoning used.

4 HEARING OFFICER: Our next witness is Jim
5 Pissot.

6 JIM PISSOT.

7 testifying on behalf of the Utah Audubon Society.

8 MR. PISSOT: My name is Jim Pissot. Last name
9 is spelled P-i-s-s-o-t. I reside in Salt Lake City at 1067
10 Lake Street. I am speaking on behalf of myself and my
11 family and the Utah Audubon Society. We support basically
12 alternative 2 as it pertains to the contiguous lands in
13 Utah particularly, with the reasoning that the intense
14 recreation that is alluded to in the draft document could
15 be mitigated to an extent by having a somewhat larger area
16 particularly upstream from the existing primitive area.

4 17 I have a problem with a couple of the terms or
18 the arguments that are used in the draft statement. You
19 seem to argue against or you seem to show a reason against
20 wilderness designation being the fact that wilderness
21 designation brings notoriety, notoriety brings more
22 visitors, more visitors impact wilderness and actually
23 reduce the suitability for wilderness. Therefore, wild-
24 erness designation itself is an argument against having
25

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4 1 wilderness designation. And I think that that's a bit of
2 a strange, roundabout argument.

3 In part, it is actually a criticism of BLM
4 Management in saying that the increased use cannot be
5 managed and that existing regulations and requirements
6 cannot be enforced. And more importantly, on the other
7 hand, it is an indication that we need more areas and we
8 need larger areas to accommodate the kind of use and the
9 kind of impact that the document is fearful of.

10 I do agree that increased use can bring about the
11 kind of deterioration that is mentioned, but I think that
12 that could be mitigated by some of the suggestions that
13 you have, such as controlling fire areas and controlling
14 number of visitors. I think it can be mitigated by stricter
15 enforcement and perhaps stiffer penalties for violations,
16 and most importantly, it can be mitigated by recommending
17 more and larger suitable wilderness areas to disperse the
18 kind of recreation that is becoming more and more popular.

19 So I would recommend that the kind of language
20 which infers that wilderness designation in fact is bad
21 for the land be replaced, and rather than dealing with the
22 symptom of that kind of impact and the results of that
23 impact, that the BLM begins to concentrate on stricter
24 enforcement, perhaps more suitable regulations and in-
25 creased areas and acreage to disperse the kind of use.

15

1 There was a statement in the document that designated or
2 suggested that Paris Canyon was fair as far as ORB use.
3 I imagine you were dealing with only the lower section
4 of the canyon. I find that statement a bit strange, having
5 spent a number of days in the area. I'm wondering where
6 ORB use, what would be considered fair in Paris Canyon.

5 7 The statement is made regarding the Piute
8 primitive areas a number of times that both alternatives
9 diminished the acreage. I think that's a bit of an un-
10 fair statement since I calculate the diminishment to be
11 170 acres, and the calculation appears to be that it is a
12 significant diminishing of the acreage. I feel that it
13 is not, so I feel that that should be addressed a bit more
14 accurately. We agree with the statement that Mr. Beard
15 has made that there has to be addressed the significant
16 impacts of protecting the drainages upstream so that the
17 characteristic of the periodic flash flooding which cleans
18 the canyons and gives the canyons the characteristics plus
19 allowing for the continued formation of these canyons
20 throughout history is important. So we feel that the EIS
21 should address the upstream drainages and the water rights
22 and the stream flows that should be maintained within the
23 Paris and Buckskin drainages.

24 We will submit a formal statement regarding the
25 acreage prior to the comment date, and we thank you for

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1 what I consider to be good management of the area up to
2 this point and for the opportunity to speak today. Thank
3 you.

4 HEARING OFFICER: Thank you, Mr. Pisano. Is
5 there anybody else who wishes to testify this evening?

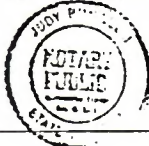
6 If there isn't anybody else, then I would like
7 to declare this hearing adjourned. Thank you very much for
8 coming tonight.

9 (Whereupon, at 8:15 p.m., the hearing in the
10 above-entitled matter was concluded.)

11
12 REPORTER'S CERTIFICATE

13 I, Judy A. Bonicelli, a Certified Shorthand Reporter and
14 Notary Public in and for the State of Utah, do hereby
15 certify that the foregoing proceedings, pages 3-17 were
16 stenographically reported by me at the time and place
17 hereinbefore set forth; that the same were thereafter
18 reduced to typewritten form by me personally; and that
19 the foregoing is a true and correct transcription of my
20 stenotype notes then and there taken.

21 I further certify that I am not employed by,
22 related to, nor of counsel for any of the parties herein,
23 nor otherwise interested in the event of the within action.



Certified Shorthand Reporter

DRAFT SUSTAINABILITY REPORT
AND DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR THE PROPOSED WILDERNESS DESIGNATION
OF INSTANT STUDY AREAS
FOR THE ARIZONA STRIP DISTRICT,
MOHAVE AND COCONINO COUNTIES, ARIZONA.

Public Hearing

IT IS REMEMBERED that on Tuesday, the 6th day of May, 1980, commencing at the hour of 7:40 p.m. thereof, the public hearing in the above-entitled matter was held in Kanab, Utah at the BLM Area Office, 320 North First East before Mr. Robert Moeller, Attorney at Law, Field Solicitor's Office for the United States Department of the Interior, Phoenix, Arizona.

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PANEL MEMBERS

Mr. Dennis Carter
E. I. S. Team Leader
Arizona Strip District

Mr. Glenn Carpenter
Co-ordinator
Arizona Strip District

Mr. Larry Royer
Wilderness Co-ordinator
Cedar City District

Mr. Bill Templeton
District Manager
Arizona Strip District

PROCEEDINGS

MR. MOELLER: Ladies and gentlemen, will the hearing please come to order?

Let the record show that this hearing was convened on May 6, 1980, in Kanab, Utah at the BLM Area Office, 320 North First East at approximately 7:40 p.m.

Welcome, ladies and gentlemen, to the public hearings on the Draft Environmental Impact Statement for the Proposed Wilderness Designation of Instant Study Areas for the Arizona Strip District, Mohave and Coconino Counties, Arizona.

This hearing is second in a series of hearings. On the 7th, a similar hearing will be held at St. George, Utah at the Four Seasons Convention Center, 747 East St. George Boulevard at 7:30 p.m., and then on May 8 another hearing will be held in Phoenix, Arizona at the Maricopa County Board of Supervisors' Auditorium at 7:30 p.m.

In addition to that, the Bureau of Land Management has scheduled two hearings to be held in Kingman, Arizona on June 3 at the English Building, Mohave Community College at 7:30 p.m. The address is 1571 Jaggerson. Another hearing will be held in Flagstaff, Arizona on June 4 in the Evergreen Motel Greenery Room, 1010 East Santa Fe at 7:30 p.m.

The Bureau of Land Management will extend the comment period on the draft for written comments to be received until 30 days after the United States Geological Survey and Bureau of Mines' Mineral Report is made available to the public, and that date when that report is made available will be published in the Federal Register.

Written comments can be sent to the State Director, Bureau of Land Management, at 2400 Valley Bank Center, Phoenix, Arizona, 85073.

My name is Bob Moeller, and I am an attorney for the Field Solicitor's Office in Phoenix, United States Department of Interior, and we have a panel of BLM officials here to receive your comments regarding the draft statement.

I would like to introduce them to you now. The first is Dennis Carter, and he is the E.I.S. Team Leader from the Arizona Strip District. Glenn Carpenter is the Co-ordinator for the Arizona Strip District. Larry Royer is the Wilderness Co-ordinator of the Cedar City District, and Bill Templeton, of course, is the District Manager for the Arizona Strip District.

The purpose of the panel being here today is to receive your comments. Their purpose isn't to be cross-examined regarding the nature of the report, but they will, in addition to hearing your comments, answer questions for

1 points of clarification on the report, or questions of a
2 factual nature regarding the report. But I won't entertain
3 questions that go to the merits of the report.

4 In addition, just to get some of the mechanics
5 out of the way in terms of the testimony that you might
6 like to give this evening, there is a ten-minute time
7 limit on testimony. When I call your name, just come up to
8 the head of the table there, give your name and spell your
9 name to the court reporter here, and if you are representing
10 a group or yourself, you might wish to mention which group
11 or organization that you represent.

12 In addition, I would like to say that both
13 written and oral comments will be given consideration,
14 equal consideration, by the BLM in their review of your
15 comments, so that if you wish to submit written comments
16 rather than testimony orally here, that is just fine.

17 I would like to begin with our first witness that
18 is scheduled to testify this evening, and that is Jim
19 Carrico. Mr. Carrico.

20 MR. CARRICO: Where do you want us?

21 MR. MOELLER: Just up at the chair there will be
22 fine.

23 MR. CARRICO: One of the major premises that I
24 would like to present at this time is the idea that designa-
25 tion of wilderness tends to destroy the wilderness that

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1 you are trying to protect. Throughout your entire report
2 this has been manifestly made evident. The constant
3 repetition of the idea that you would have to begin to
4 police the area, you would have to protect the archaeo-
5 logical sites, you would have to essentially begin to
6 control an area that has been protected for over 100 years,
7 even though it has been used.

6 8 Looking at your report itself with reference to
9 the minerals, and I am taking this from the areas going
10 down through the report, the lack of tests is no indi-
11 cation of the presence or lack of oil and gas in an area.
12 The test drilling throughout Kane County would preclude
13 the existence of oil, gas, uranium, copper, vanadium and
14 other minerals in this general area. To lock this area
15 into wilderness at this time without any knowledge of what
16 is being locked in is tantamount to criminality.

17 Lead and copper have been found in deposits
18 north of the area comparable to the geology of the Paria
19 Canyon. This would presuppose the existence of copper and
20 lead in the canyon. There is a correlation of uranium to
21 copper deposits. Uranium has been found in deposits north
22 of the canyon just a short distance.

23 With reference to the cultural resources, nine
24 archaeological sites are of such importance to us and our
25 neighbors in the Kaibab Paiute Tribal Council as to

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1 recommend that you use discretion and judgment. First,
2 site location of these areas should not be placed on your
3 map. The idea of a rapacious grave-robbing mucking through
4 these historical sites is abhorrent. If these sites are
5 to be opened, they should be opened only under the juris-
6 diction and with the dedication of a professional archae-
7 ologist.

8 If these sites are adjacent or visible on a
9 regular trail or easily accessible from the trail, then
10 this trail should be closed until such time as the sites
11 can be properly excavated. The blatant attitude of throw-
12 ing this area open for indiscriminate advertising and
13 promoting as wilderness constitutes a threat to these
14 archaeological sites. We submit that this is a prime
15 argument for maintaining this area on a status quo basis.

16 In fact, if anything, it should revert to the
17 status prior to designation as primitive.

18 Since the time of John D. Lee and the establish-
19 ment of Lee's Ferry the local residents have been in this
20 area of Paria and Vermilion Cliffs. These sites are still
21 there for you to see. And yet, allow the random travelers
22 to come to a pristine area and he leaves his mark of
23 destruction and his name boldly written behind him. The
24 cattlemen of the area have known of these artifacts of
25 prehistoric man of the area and have left them alone. It

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1 is to be trusted that the same would hold true today with
2 the cattlemen, but not with the visitor.

3 Our recommendation is to preserve the archae-
4 ological sites to maintain this area as it is presently
5 constituted, to desist on the advertising of the area and
6 promote the multiple-use concept of the entire area.

7 You have played some prominence with reference
8 to public attitudes. It is felt that this response to
9 the Bureau of Land Management Report is an exercise in
10 futility. "It doesn't matter what you say, they already
11 have their minds made up!" The Sagebrush Rebellion was
12 not brought into being because of the equitable and
13 reasonable attitude of the Bureau of Land Management, the
14 Forest Service and the National Park Service. Big Brother
15 does not know what is best for us. Nor should big govern-
16 ment listen to the few vocal individuals of Washington to
17 the exclusion of the people who have to live with and work
18 on the land.

19 We express strong opposition to excluding
20 multiple-use: cattle and mineral development, predicated
21 on some esoteric and recondite formulation of the illicit
22 few for the affluent few. We resist the concept of
23 exclusionary singular use of the land and the land's
24 resources by congressional demand or federal fiat. We
25 submit that historic utilization patterns has precluded

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multiple-use of the land in some areas. We feel that such status would remain regardless of man's efforts.

Additionally, our assessment of the land and its resources indicates that there are areas that should and shall receive special consideration from the county commission and the county planning commission. However, we reject as asinine, futile and the nadir of proper land management, the designation of these lands as wilderness to promote increased detrimental utilization of these areas. For you to bring in the backpacker and the idle curiosity seeker to wander through this land is inexcusable.

Further, if wilderness is "good" and if wilderness is needed and if wilderness is a desired element in and of itself, then we submit that such wilderness areas are and of a right ought to be located adjacent to and in proximity to those that would be using them.

Fuel economy and other federal constraints that are prevalent in today's society dictate that if these areas are needed then place them in New York State, New Jersey, Rhode Island or wherever, but do not isolate them half a continent away from those that would be using the areas.

I take exception to the following points raised in reference to the proposed action: The preclusion of all mineral (especially oil and gas) exploration and

development is to our way of thinking wasteful of the natural resources of the area and inimical to the philosophy of national self-sufficiency. I reject this concept.

Two, the transplanting of bighorn sheep may be construed as a futile effort especially in light of previous Bureau of Land Management attempts to bring the sheep into this general area.

Three, the VRM Class I guidelines are to our way of thinking an inappropriate concept utilized for the purpose of undue control of non-wilderness characteristic lands.

With reference to the visual resources, here again the Bureau of Land Management confirms our basic thesis that designation destroys. I quote from your report: "On the other hand, if the wilderness designation attracts more people to the area, littering might increase and user permits might be required to control resource abuse."

Earlier in this report it was noted that since the drums began beating about the "Faria Wilderness" that the visitor use has increased. This is a foregone conclusion that wilderness designation will enhance and foster increased visitations to the area. The result will be an additional level of bureaucracy to administer the wilderness areas with permits and other controls to prevent resource abuse.

In conclusion, your report that you have prepared for our review is replete with references to the vandalism, the factor of human waste throughout the entire area. In the 100 years that our people have been in this area and have been using that area, it has remained pristine and of wilderness quality. In the nine years that you have had this as a primitive area, you have already had to begin to have cleanup campaigns to rectify the situation.

My recommendation is to go with the third alternative with one option which is to return this entire area back to its status prior to the designation as primitive.

MR. MOELLER: Thank you, Mr. Carrico. You have previously submitted a final statement to us. Would you like this included in the record?

MR. CARRICO: Yes, I would. Now, that is for the Kane County Commission, not for myself.

MR. MOELLER: Let the record show that I am marking as Exhibit A a final statement entitled Kane County Commission's Response to U. S. Department of the Interior Bureau of Land Management--Arizona, and we will make it part of the record as Exhibit A.

(Whereupon, Exhibit A was marked for identification.)

MR. MOELLER: Our next witness is Douglas Carroll. Do you wish to testify, Mr. Carroll?

MR. CARROLL: There may be a question later on. The serious consideration I have for this is that wilderness designation as such is discriminatory to the handicapped. How do you expect a handicapped individual who is just as entitled to enjoy the quote natural beauty of these resources, how do they get there if there is no road or anything to get there? And number two, how were these studies done if the majority of them were done through use of vehicles?

Now, I don't think very many of you walked in to check this area. Some did, but a lot did not. But I believe it very discriminatory to those people who are physically incapable of viewing these areas. The question mark should remain. We may have other things later on as we go.

MR. MOELLER: Okay. The next witness is A. D. Findlay.

MR. FINDLAY: I believe I will pass for a little bit.

MR. MOELLER: Our next witness is Mr. John Rich.

MR. RICH: My name is John Rich from Jacob Lake, Arizona. I have the same point that the previous witness

made, and that is that it's been kept as a wilderness and pretty much its original state, and I can't see how the designation as an official wilderness area is going to improve it much. People who want to get in who seriously want to get in and see the area can get in. They have to watch some to see some of the best viewpoints, and it's a trip worth making.

On the Paria Plateau and some of those rim views and various places, particularly, in my point of view, looking down in the Paria Canyon over Lake Powell and towards the Kaiparowits Plateau, is a tremendous view.

But I can't see how you are going to improve them much. I think a lot of money is going to be spent. I heard this morning that 46 percent of our national income is now going into federal, state, and local taxes. It seems to me that you fellows have no end to your appetite, and it says--I remember a quote from the Book of Isaiah that says: Ye lawmakers who bind up burdens grievous to be borne and lay them on men's backs and touch them not with one of your own fingers, and sometimes that is the impression we get with some of your fellows.

There is no end to some of the things you can think of for us to do. There is no end to the taxes or the spending, no end to your plans. And your bureaus grow and grow, and you add more and more people. But I don't see

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the results.

I see, for example, this area in the Arizona strip that is in bad condition. It needs to be restored and renovated, reseeded, and soil erosion and land protected. I see a reseeding project by the Forest Service up against the fence with BLM lands, and the erosion has pretty well stopped on that Forest Service land, but it goes on and on and on.

I drove a stake in the ground about eight years ago, and the soil is two inches lower in that stake than it was when I originally drove it there, and it is not in a gully. It's just out on the flat. I think you are straining at gnats and overlooking the camels, frankly. There are much bigger projects.

The real care, the restoration and the real care of the land, I think it's much more important at this time that the money should go into that sort of project rather than so much wilderness and so much increased management. How much food and fiber do you fellows grow? Not much. We grow quite a bit, and we work pretty hard to do it. And you keep adding to your numbers.

If you retire after 30 years' service, you have a pretty good retirement, and if we retire after 30 years we get maybe--not much if we go on Social Security. What is it? Five hundred a month? What do you fellows retire on

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after 30 years?

I have put in Social Security all my life, and I think you need to really open your eyes and see what is really going on here.

MR. MOELLER: Thank you, Mr. Ricb. The next witness is Jim Glover. You have a question mark next to your name.

MR. GLOVER: I have a question on this fence that is going down through Half Rock Valley. The Forest Service is putting it in, and it comes supposedly down a boundary line. They are leaving the old fence in there, which is a perfectly serviceable fence anyway to begin with. They are not completely finishing a fence, they are leaving a jog and going on down here a few miles and starting another to use up the rest of their wire. It's not going to do one earthly bit of good. All it could possibly be doing is making a job for somebody just to make a work project that is absolutely useless.

The other thing I do want to say is I agree with the statement that has been made so far, and if there was one question I would like to ask, I really would like to ask what good does a meeting like this do? I mean, is the minds already made up? I haven't seen anybody out around the Paria Cliff checking this for wilderness area all winter long. I have been out there, but nobody else has.

15

I haven't seen anybody out there checking it. What have they done? Just go along and looked at the cliff to see if that is what they want to make a wilderness area out of, or have they drove out there a little ways?

The other thing I just want to say is, if we can have an answer to whether this is already settled before we have something like this, what is the use of having something like this?

The other thing is, on your Proposed Alternative No. 3, if we have to go along with one of these, why my vote is to go along with Proposal No. 3. I am connected with Vermilion Cliffs Cattle Company in the Paria Plateau.

MR. TEMPLETON: The decision is not made at this point, and what we are getting from this is anything that the people here who are interested can provide, they will help make that a good decision when it is made. Now, the Congress of the United States will make the decision on that.

MR. GLOVER: One other thing which may not be anything major to anything here, but it may be an input that should be put in, fuel is quite important. Okay. There is two major communities, and why it don't mean anything with you around the local area, it does mean a lot to them. If they shut this off out there on some of these proposals, hundreds of thousands of cord of wood,

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8 1 fuel that people is coming in there and taking out, is
2 going. I mean, it's being tied off to them, and fuel is
3 an important factor. It has never been included in that.

4 Get out around that place and look and see how
5 much old, dry, good wood, cedar and pinion is going to
6 waste if it's shut off. The Navajos, the Indians, they're
7 coming in there by the droves now and hauling wood because
8 they haven't got any place else to go, and there is wood
9 enough there to last them yet for years and years, and it
10 needs to be out of there and put to some use. Thank you.

11 MR. MOELLER: Our next witness is Kirk Heaton.
12 Mr. Heaton.

13 MR. HEATON: It's my understanding that basically,
14 the BLM response is that you haven't proposed an action
15 yet. This is for input, and then an action would be
16 proposed when the final decision would be made by Congress?

17 MR. MOELLER: Right.

18 MR. HEATON: But it is my understanding from
19 reading on Page 5 that the BLM proposes to designate those
20 certain areas as wilderness areas, and so your proposal
21 would be to go to the state office and then back to the
22 Washington, D.C. office and propose that these areas be
23 designated?

24 MR. TEMPLETON: That is correct, with the alter-
25 natives, so that there could be a selection made.

17

1 MR. HEATON: Right. But it is the final proposal,
2 at least of this draft, that BLM's action would be to make
3 a proposal that the areas would be designated wilderness
4 areas.

5 MR. TEMPLETON: Yes. The suitability report
6 actually did that.

9 7 MR. HEATON: I have a couple of concerns referring
8 to the environmental consequence on Page 1 in the summary,
9 making reference to the third one marked Increased Vandalism
10 to Cultural Resources to Increasing Visitors' Use, and then
11 the next one indicates that it would provide additional
12 protection for scenery.

13 I am wondering if those two concepts aren't
14 somewhat inconsistent if you are going to increase
15 vandalism, but at the same time provide additional
16 protection, and I think that is carried down into the next
17 section, too, where it says, "Benefit all wilderness
18 resources by legislatively (thus more permanently)
19 protecting areas with wilderness values," and then the
20 next concept is "Increase visitor use in Paria Canyon,
21 which could increase vegetation destruction, erosion, soil
22 compaction, fire rings, vandalism, litter and human waste,
23 and fire potential." It seems that those are relatively
24 inconsistent if we provide more permanent protection for
25 wilderness values, but at the same time allow by designating

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9 1 these wilderness areas more people to come in and then
2 tear down the same values that we are supposed to more
3 permanently protect.

10 4 I would like the record to reflect that. I
5 think there are some inconsistencies brought out there.
6 I do have some other inconsistencies or questions in my
7 mind more on the economic aspects, and I make reference to
8 Page 2 where it discusses, "By the year 2000 annual
9 economic benefits under the proposed action and Alternative
10 I would increase by \$99,400, and annual economic benefits
11 under Alternative 2 would increase by \$128,400.

12 The way I understand that to mean is that by the
13 year 2000 because of the increased visitors to the area
14 having had those areas designated as wilderness areas,
15 we would have an increased economic benefit to our
16 community, our communities within this area, on an annual
17 level of approximately \$100,000.

18 But making reference on Page 29, there is some
19 additional discussions as to the economic benefits, and it
20 indicates that in 1977 the annual expenditures was \$542,000
21 locally, and that by the year 2000 it would be approximately
22 \$504,000, and I don't know whether that increase is the same
23 increase that is supposed to be contemplated by the
24 increase as referred to in Section 2.

25 I am just confused in that, and perhaps in the

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11 1 final it could be clarified, because I am a little confused
2 on that particular portion, and I have become a little
3 more confused when I make reference to Page 57.

4 It discusses some of the same benefits, and
5 indicates that they would be about the same, but it
6 indicates that no specific impacts to economics conditions
7 in the environmental study area are expected under the
8 proposed action or alternative. I would like to question
9 the panel to find out whether they have contacted the
10 local law enforcement officers, and I make reference to the
11 Kane County Sheriff's Office for our county, the Search
12 and Rescue organized by Kane County.

13 I would make reference to the Coconino County
14 Sheriff's Office, also. With that I would like to illustrate
15 it by an example, and that would be that several years
16 ago there was a search conducted by those agencies that I
17 have just made reference to in the Paria area for some
18 people that were lost, and I talked with one of our
19 deputies, and I ought to indicate that I am employed by
20 Kane County, and I am the Kane County attorney. He
21 indicated that there was an expenditure in par hours, and
22 that from Kane County with the Search and Rescue and the
23 law enforcement personnel on the two-day search, an actual
24 expenditure of approximately \$2,600. That does not include
25 the helicopter that was hired by Coconino County to go in.

20

11 1 That does not include the manpower and time and actual
2 out-of-pocket expenses by the Coconino County Sheriff's
3 Office.

4 Taking that into consideration, I could assume
5 that maybe that search cost the taxpayers of Coconino and
6 Kane County in lost wages, manpower expenses, or actual
7 out-of-pocket expenses, let's say \$5,000, using the \$2,600
8 figure from Kane County.

9 If we had two searches a year, in just one year
10 which is unrealistic with the number of people visiting
11 those areas, we are looking at \$10,000 out-of-pocket
12 expenses by local government. Over a 20-year period we
13 are talking \$200,000, and that doesn't include having
14 those local governments go to the expense of going out and
15 building stables to house horses and mule trains so that
16 they can go in and not take their 4-wheel drive vehicles
17 which they did last time. I am not sure that under the
18 wilderness designation that they can take the helicopters
19 in.

20 I think that those expenses ought to be looked
21 at. I think the comments ought to be obtained from those
22 departments. They are affected.

12 23 I was disappointed that the comment as set forth
24 on Page 62 for the local governments, that those comments
25 that would be solicited, that Kane County was ignored.

21

12 1 The Kane County Commission was ignored. The Kane County
2 Sheriff's Office was ignored. The Kane County Search and
3 Rescue was ignored. I think those ought to be included.

13 4 I would also indicate that I think that there are
5 additional expenses that have either been ignored or at
6 least hidden, and I make reference to, on several occasions,
7 the flash flood season in Paria creates a problem for
8 visitors in that area, and I am aware that on occasions
9 the BLM has had to take their personnel, fly down the
10 river dropping leaflets, which I don't know how that adds
11 to the wilderness characteristic of the Paria Canyon area,
12 but they have to drop leaflets and tell them to get out of
13 the canyon, a flash flood is on its way. Those are
14 increased expenses.

15 In looking at the map, you are looking at large
16 areas. There is large acreages involved, and there is
17 large parameters, and I would anticipate from my past
18 experience with the BLM that we are going to have to
19 designate one guy to patrol that section to make sure no
20 one goes on there with his 4-wheel drive vehicle, and
21 then the next square mile we get another individual. Well,
22 to get them there we are going to have to buy each of them
23 an individual pickup, because they can't go in the same
24 pickup, and I think there are going to be some specific
25 expenses.

22

1 As far as I am concerned, the only alternative
2 that is proposed here is no action and Alternative 3, and
3 I thank you for your courtesy.

4 MR. MOELLER: Thank you, Mr. Heaton. The next
5 witness is Mr. Greg Woodall. You have got a question mark
6 by your name. Would you like to speak, Mr. Woodall?

7 MR. WOODALL: Well, I have grown up in the West,
8 New Mexico, Arizona, and the last few years here in Utah.
9 I have lived in very small towns, and I have lived in
10 Phoenix, Arizona, so I have sort of seen the whole gambit.
11 I don't know. Sitting here listening, I could almost
12 agree that maybe we ought to put it back in the multiple-
13 use category. However, that is not realistic. Nothing
14 we can do is going to change it.

15 The population of this country is increasing.
16 The people want to go out on their free time. They want
17 to look into the wild places that are left, and as a
18 result, some of those areas aren't wild any more once they
19 leave. But the designation doesn't really matter. I have
20 come to realize that.

21 I have seen favorite little places. I have told
22 no one about them because I have seen what happens. Once
23 you take a picture and show it to someone, they go there,
24 and then they tell their friends about it, and they tell
25 their friends about it, and the next thing you know you

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1 have a whole party down there every time you go there, and
2 you don't want to go there any more.

3 You say that these areas have been protected
4 for the last hundred years by the locals that have ranched
5 out here and the people that have grown up in this area.
6 They haven't abused the land. They haven't destroyed the
7 archaeological sites. Well, like it or not, unfortunately
8 I think that is all going to change. The future doesn't
9 look too rosy.

10 However, wilderness designation can have its
11 benefits. It can protect an area from destructive methods
12 of mineral exploration. I have seen mineral exploration
13 in existing wilderness areas. I have seen ranching
14 operations in existing wilderness areas. I have seen all
15 kinds of economic activities being conducted in wilderness
16 areas, also the increased visitor usage.

17 I don't know if it's a true thing, but the
18 designation does seem to bring increased people in an area,
19 because people start taking pictures, and it starts getting
20 in all the national magazines, and the next thing you know
21 it's not just your little private spot any more. But that
22 is going to be happening throughout the West and throughout
23 the country, and I think it's about time that people
24 realize that population increase means that sort of thing,
25

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1 and if we want to come to grips with population increase,
2 well, this isn't the place for it, I don't think. But
3 that is really what we are all talking about.

4 I myself would like to see expanded boundaries
5 above and beyond Alternative 2, I guess, which is the green
6 boundary, the reason being, the very thing I have said
7 with wilderness, you can have management policies worked
8 out which can lead to the protection of the resources.

9 The people have brought up the fact that the
10 wilderness is going to cause the increased costs due to
11 a management plan. Well, I think that management plan was
12 coming anyway. I think you have to be realistic and sort
13 of realize that. If this thing was put back into multiple-
14 use they would still be making up a management plan. With
15 the Panguitch Primitive Area, it's the same way. I would like
16 to see increased boundaries.

17 I will be submitting detailed comments in writing
18 in the future. Basically, I think wilderness designation
19 can be a good thing, and I look forward to a future of that,
20 and I have seen these areas. I am not one of these folks
21 who is back in New York who says, "Oh boy, I like
22 wilderness." I have been out in these areas. I have seen
23 them from the air and on the ground, and I have got stuck
24 out in them, and they are wild places, and I would like to
25 see them kept that way.

25

1 There is also one other thing I wanted to bring
2 up. Well, it escapes me now. I will let it set, and maybe
3 I can think about it later on. But I think the BLM has
4 done a real good job.

5 MR. MOELLER: Thank you, Mr. Woodall. Our next
6 witness is Mr. Bob Russell. Mr. Russell.

7 MR. RUSSELL: My name is Bob Russell and I am
8 from the Kane County Commission. On behalf of the Kane
9 County Commission I wish to take serious exception to the
10 demands imposed upon the Kane County Commission wherein
11 we were given only two weeks to review the 118 pages of
12 the Environmental Impact Statement and Sustainability Study
13 and then to draft a response. We received this report on
14 April 22. This is hardly an adequate period of time to
15 study, much less respond to such a wide-ranging report
16 that shall have impacts on Kane County for years to come.

17 The Arizona Strip Wilderness Review arrived in
18 the same time frame as the Bureau of Land Management
19 Intensive Wilderness Inventory for the State of Utah.
20 There are 36 areas in that report in which Kane County is
21 severely impacted. Each of those areas has to be addressed
22 in a response. Additionally we have just concluded a
23 special report requested by the Cedar City office of the
24 Bureau of Land Management regarding Alternative No. 4 of
25 the Alton Coal Project (the BLM calls this the Allen-Warner

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1 Valley Project.)

2 On April 24, we received the Summary Report of
3 the Range Management Program of the Vermilion Planning Area
4 for the Arizona Strip Bureau of Land Management for review.
5 In addition, the Office of Surface Mining has had meetings
6 this day on the coal unsuitability for which we have been
7 required to prepare statements of concern. This is
8 totally different from what we understand from the Bureau
9 of Land Management's Coal Unsuitability Study that was
10 completed in mid-April.

11 Finally, the National Park Service required a
12 response a week ago on the Transportation and Accommodation
13 Study for Zion National Park.

14 In brief, Kane County submits that you are not
15 wanting comment from us. You are inundating us with reports
16 requiring responses in the hope that we will throw up our
17 hands and acquiesce. Utah State Director of the Bureau of
18 Land Management, Gary Nicks, admitted this attitude in his
19 public comments at a seminar held at Utah State University
20 on April 24, 1980. When asked what the local officials
21 should do about all of this material with such short periods
22 for response, Mr. Nicks said, "Let us (meaning the BLM)
23 plan for you!"

24 We cannot accept this alternative. Further,
25 formal complaint is being lodged with the congressional

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1 delegations of Utah and Arizona regarding this vast influx
2 of materials with such short time frames for a response,
3 especially with counties that have little, if any, staffing.

4 To the report itself, the Kane County Commission
5 strongly supports Alternative No. 3 with a proviso that the
6 "primitive" status be removed from the Paria and Vermilion
7 Cliffs areas.

8 We reject the statement that wilderness values
9 should have precedence in water resource development over
10 cattle and livestock. The impacts to the cattle industry
11 generated by the previous haphazard mandates of the Bureau
12 of Land Management have been extremely harsh. We cannot
13 accept or condone additional adverse impacts.

14 The additional restriction of resource exploration
15 and production in eastern Kane County is unconscionable.
16 Our preliminary research indicates that there is a strong
17 possibility of oil, gas, uranium and gypsum in the area.
18 This unscrupulous attitude is predicated on nothing more
19 than a willful whim of resource planners in the Bureau of
20 Land Management.

21 Another item that is especially important to us
22 is that wilderness designation tends to destroy an area.
23 If you or any other individuals are interested in preserving
24 an area in wilderness, then do not designate it as
25 wilderness. By designation, you are inviting pollution,

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1 vandalism, destruction, erosion and thereby nullifying
2 your original action.

3 This area has been kept in a "pseudo-wilderness
4 state" since man first came on the scene well before the
5 time of Christ. By designation you will destroy this area
6 just as the High Sierras have been ruined along the John
7 Muir Trail by the greedy over-utilization by the Sierra
8 Club for pecuniary advancement. The few motorized vehicles
9 in the area will have far less impact on the area than the
10 myriad of hikers following the Wasatch Wilderness guides
11 down the trails. The Bureau of Land Management anticipates
12 that there may be as many as 22,000 a year visiting this
13 area.

14 Legislative action on wilderness does not protect
15 an area. It destroys it. At what point will the Bureau
16 of Land Management ascertain the carrying capacity for the
17 Paria Canyon area and when it has been surpassed? After
18 the area is no longer pristine. To keep the area wild,
19 keep quiet about it.

20 The impacts on the cattle industry will be
21 severe to our way of thinking. Throughout the entire
22 report prepared by the Bureau of Land Management, there
23 have been inconsistencies. Earlier it was stated that the
24 wilderness designation would do no economic harm to the
25 area and yet on Pages 27 and 28 it indicates that there are

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14 1 eight ranchers that will be curtailed in their operations,
2 will be denied easy access to caring for their cattle and
3 essentially will be stopped from the maximum utilization
4 of the resource for running cattle.

5 Also, if the Bureau of Land Management follows
6 the principle laid down by the Forest Service, when the
7 permittee dies or sells out or moves away, the permit
8 expires and becomes extinct. This will ultimately have
9 an impact on the county, and the cattlemen of the country.
10 We resist this designation from that standpoint. There are
11 21,042 active privileges for AUM's in this area. This is
12 not supposed to be substantive? It is obvious that the
13 researchers and writers within the Bureau of Land Management
14 do not have to make a living with cattle, just paper. This
15 would be an impact!

16 The various actions will not inconvenience the
17 ranchers as stated in the BLM's report. It would not
18 inconvenience the ranchers in their livestock management,
19 the actions would serve to nullify any ranching operations
20 in the entire area. It would kill the cattle industry in
21 the area.

22 A final point that I wish to make is that it is
23 truly a shame that the Kane County Commission, the Kane
24 County Planning Commission, and the City of Kanab are not
25 important enough to be consulted with and co-ordinated with

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1 in the preparation of this report. We do not rank with
2 the 97 different individuals or agencies that were
3 contacted. The listing ranges from the Autobahn Society
4 through the Wildlife Federation. And yet, Kane County,
5 whose ordinances under the Federal Land Management and
6 Policies Act have to be complied with, were not contacted,
7 notified, consulted or allowed to review the ongoing
8 process. It is fortunate that we were allowed by some
9 happenstance to have an opportunity to respond to the
10 Draft Environmental Impact Statement and Suitability Report.
11 Someone somewhere slipped up. We take exception to the
12 conclusion.

13 In conclusion, the Kane County Commission
14 respectfully submits that the Bureau of Land Management
15 in their Arizona Strip Wilderness Draft; Environmental
16 Impact Statement and Suitability Report has failed to prove
17 their thesis that the Paria Canyon and the Vermilion Cliffs
18 areas are suitable for wilderness designation. In point of
19 fact, the reverse is the case. Throughout their report
20 they have consistently delineated the position of the Kane
21 County Commission that such designation would serve to
22 degrade if not ultimately to destroy those areas that have
23 been preserved even though utilized over the past 100 years.
24 We are opposed to the wilderness designation for the Paria
25 Canyon and Vermilion Cliffs areas.

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1 MR. MOELLER: Thank you, Mr. Russell.

2 MR. CARTER: I would like to assure you that Kane
3 County Commission was included on the mailing list, and
4 it was inadvertently apparently left off at some point when
5 it came out of our machine. That is the only thing I can
6 say.

7 MR. RUSSELL: Evidently.

8 MR. HEATON: That is also the case with Coconino
9 County.

10 MR. CARTER: Every county that would be affected
11 by this was included on that mailing list, and if it was
12 dropped out, it was omitted by human error.

13 MR. MOELLER: Is there anybody else that wishes
14 to testify this evening? Just identify yourself.

15 MR. FINDLAY: A. D. Findlay, Kanab, Utah.

16 I believe I have been here on the Strip about as
17 long running animals as anyone in this room. I remember
18 out on the Paria Plateau, it was about 38 years ago last
19 month, the first time I went out there I didn't see a can
20 anywhere we went. There wasn't too many roads, and it was
21 hard to go, and before the 4-wheel drive, but there wasn't
22 a can in the country. You can't drive along the road any
23 place where you can't throw a rock from can to can. They
24 wasn't put out there by the people that use it. I can,
25 the stockmen. They was put there by other people.

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1 You get to tellio' about putting it in a wilder-
2 ness and that. There isn't a drop of water in that plateau
3 but what was man-made. It was all made with their own
4 efforts and their own money. Now the BLM, of course, they
5 are trying to spend some money. I believe in the free
6 enterprise system, and I have fought them. I don't want a
7 dime of their money. I don't think other people ought to
8 take a dime of their money. I come in here and sat in this
9 meeting and counted them out, and I believe that there is
10 about 16 Bureau guys and 15 others the way I looked there
11 a minute ago. I just can't account for it. The instigators
12 of all these wildernesses has got to be bureaucrats: you
13 fellows. What do you do it for?

14 Here we are. We have got an energy shortage, and
15 we got enough oil up in Alaska to take care of our nation
16 for 100 years. We can't get it just on account of bureau-
17 crats. I think it is time we was rebelling against the
18 bureaucrats, putting them out, getting rid of them. They
19 are just a bad breed. That is all there is to it. There is
20 good fellows in them, don't take me wrong that way. But
21 the philosophy of the whole thing is wrong. I don't think
22 it ought to go any longer.

23 But the idea of a wilderness. You read about a
24 guy who wants a wilderness. He wants solitude. Take him
25 down in the Carlsbad Caverns where they take you, and turn

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1 the lights out, and let him stay in there. He will have all
2 the solitude he wants. Put him on death row in one of
3 those cells there. He will get all the solitude he wants.
4 I think it is selfish to have a singular use for everybody.
5 As long as this is multiple-use anybody can use it as long
6 as he doesn't break the laws of the land, and I think that
7 is enough for anybody.

8 Nobody would have been there anyway if it hadn't
9 have been for the stockmen that is in there now. There
10 wouldn't have been wildlife or anything else. When you
11 talk about seven or eight fellows there, I have been to
12 meetings in the Western States for the last 15 years, and
13 I don't think that anything we say counts. Anything. I
14 have been to meetings in every state in the West, and I
15 haven't ever seen anything come out of any testimony anybody
16 gave.

17 It's just like this Navajo deal started. He
18 would go to meetings. There was a fellow there, coming
19 back to bureaucrats again, and he didn't know that there
20 was any white people in there. He thought they was all
21 Indians. He finally got up and said: There is only eight
22 ranchers out there. He said: If you guys was wise, you
23 would go out when they was on those places, and you would
24 annihilate them, and we wouldn't have to monkey with them
25 any more. I don't feel good about these kind of things. I

34

1 think they ought to serve a little term in the penitentiary,
2 and they would know what rights are. You kick us out, and
3 they tell them you can run stock on the wilderness. It is
4 damn hard to run them on the BLM under the present
5 conditions.

6 I was here before the BLM started, I guess in
7 1930, and I took a herd of sheep up here on the divide and
8 come down Johnson Canyon and went clear across the Strip
9 to Sunkerville and back, and I have never seen the Arizona
10 Strip look since then like it did that fall. It was
11 managed by the people that was running the range, and there
12 were thousands of sheep and horses and cattle. Now they
13 are all gone, and we have got a different kind of a
14 management than we used to have there. Mother Nature used
15 to manage it then. That is the whole story of the whole
16 thing.

17 But it's easy to go and tell some guy, Oh, gosh,
18 get them off of there. If you are 67 years old, and all
19 you had in God Almighty's world was what I got out there
20 to know tomorrow is going to go, what would you think
21 about it? There is not a damn one of you BLM guys who don't
22 get a pension. You get more money just free gratis than
23 I make in a whole year with a big investment. There isn't
24 anything fair about any of it.

25 But somewhere along the line some day there is

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1 going to be some justice, I do believe, and I don't think
2 it's too far off. I think people is just about fed up
3 with bureaucrats running our country.

4 MR. MOELLER: Thank you, Mr. Findlay.

5 Does anybody else wish to comment this evening?

6 MR. JENKINS: My name is Paul Jenkins, and I am
7 representing the Kane County Cattlemen's Association of
8 which I am the president. I am disappointed that neither
9 the City of Kanab or the Kane County Cattlemen's Association
10 ever received any of this information until tonight. Now,
11 how are we supposed to prepare testimony when it affects
12 our people, both the City of Kanab and all of the ranchers
13 in this area, when we don't receive anything? We walk in
14 here to the meeting, and I didn't know there was even a
15 meeting until it came out in the Southern Utah News last
16 Thursday. I can't give testimony to something if I don't
17 have anything to respond to.

18 I am terribly disappointed in it.

19 MR. MOELLER: Thank you. Would anybody else
20 like to testify?

21 MR. CARROLL: I would like to add a little bit.
22 I have a little bit of interest in livestock and a little
23 bit of interest in the business industry in this county.
24 I am representing one of the financial institutions. First
25 of all, a comment was made that the decision was made and

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1 is made in Washington, which is an asinine concept. The
2 decision in Washington, yes, is made there, but it's made
3 solely on the input that is given on a local level.

4 I personally cannot accept that concept that
5 the decision is made in Washington. I know as well as
6 anyone else that it is based strictly on what is given
7 to them on a local level. So let's not try and snowball
8 our people here with that idea. I think that the comment
9 has been pretty well made that the local people were not
10 consulted adequately. I think that is not very good. In
11 fact, we are the people living here trying to make a
12 living, and the Commission, the City, the County, the
13 Cattleman's Association, et cetera are responsible for
14 various facets of this county. They should, in fact, be
15 allowed opportunities to respond and have input to it.

16 I noticed an interesting thing here in your
17 little booklet. It takes three men and a boy to get through
18 this. It looks to me like the legislative action is getting
19 ahead of this. This is a draft. There was an act in 1964,
20 the Wilderness Act, signed into that at that time apparently
21 whereby the Department of the Interior was given charge of
22 managing federal ranges. It seems now that we are in May
23 of 1980 at the deadline for getting all these things taken
24 care of. Between now and July 1st is a pretty short time
25 period.

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1 I think what that leads to is hasty and quite
2 honestly irresponsible decisions without the necessary
3 input. The county, as I see it from an economic point of
4 view, is going to be impacted. The livestock people cannot
5 continue to operate when they are allowed one half of an
6 AUM per acre, or whatever, on this project.

7 Now, what do you do? Which half of the county
8 do you run? That seems to be a serious problem for me. I
9 don't know how to divide a cow in half and still run the
10 old girl. She just isn't going to make it. So I am a
11 little bit concerned about that. This is not a major
12 farming area when compared with the rest of the United
13 States, but it will have a serious impact in Kane County
14 when we annihilate the farmer and the rancher off these
15 properties. He has got an input to us.

16 Another serious consideration is if there is no
17 economic development, referring to energy developments,
18 our tax base is going to stay as is, meaning very low. Our
19 economy is perhaps at a poverty level on the county level.
20 Now, I don't know about you, but poverty isn't good, and I
21 hate to see the people of this county continue in that. We
22 need the development. Heaven knows the nation needs the
23 energy development.

24 Have you seen what we are paying to the Arabs?
25 We need the local energy developments that are available.

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1 If these things go through and cut those
2 developments off, it will have a serious impact. The
3 dollars and cents put in here really are not impressive.
4 We see those every day just in little odds and ends that
5 we are working with.

6 I couldn't see it in here, and I had no oppor-
7 tunity to read it prior to tonight, very little consid-
8 eration if any was given to the loss of income or loss of
9 monies that is going to come into this area because of the
10 development of coal and what other resources may or may
11 not be available. I think this consideration must be
12 given before a final decision is made on July 1 of '80.

13 MR. MOELLER: Thank you, sir. Is there anybody
14 else that wishes to testify this evening?

15 MR. RICH: I would like to say one more thing.
16 Jim brought out the point of the Navajos' need for wood,
17 and I think that Paria Plateau and the north of the end of
18 the Kiabab Plateau where the pinion and juniper is is one
19 of the few areas that wood supply is available to the
20 Navajos. They have about used up everything they have,
21 and they do a pretty good job of preserving their live
22 trees, but there aren't many left. I have been over there.
23 I have an adopted daughter who has brothers and sisters over
24 there, and I have been over there to see what they have to
25 do to get their wood, and this Paria Plateau in the north

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1 end of the Kiabab and the side of the Kiabab are extremely
2 important to them.

3 To tie that up and to make it unavailable to them
4 would be a pretty serious hardship on them.

5 MR. MOELLER: Thank you, Mr. Rich. Anybody else?

6 MR. HEATON: I just have two questions. You
7 indicated that the comment period for written comments
8 would be 30 days after the publication of the notice in the
9 Federal Register. I am unaware of any of us that subscribe
10 to the Federal Register in Kane County or any of the other
11 things. It is a little cumbersome to have in any office.
12 Is there any other way to notify us?

13 MR. TEMPLETON: We will take care of you.

14 MR. HEATON: Okay. The other question that I
15 have, and perhaps you are the one that answers that, is is
16 there a possibility of having transcripts available or
17 produced at cost of these proceedings?

18 MR. MOELLER: I am looking into that now,
19 Mr. Heaton, and if you will leave your name and address
20 with me at the end of the meeting, I can find that out.
21 There is a question regarding whether or not you should
22 obtain it from the court reporter or obtain it from the
23 Federal Government under the Freedom of Information Act.

24 MR. HEATON: I know that has been raised in other
25 hearings, and in some the court reporter indicated that

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1 upon the payment of so much for transcript costs that
2 they would provide a copy.

3 MR. MOELLER: That is just a legal question, and
4 we will have to research it. It is an important issue,
5 because I think the amount you will have to pay for the
6 copy will be significantly different depending upon whether
7 or not we supply it to you, or whether the court reporter
8 supplies it to you.

9 MR. WOODALL: In this wilderness hearing when we
10 have been talking about the energy situation, and the
11 energy situation is a good example of it, but so is what
12 we have been talking about with the Paiute and the Faria
13 areas, and I guess that is what the future is going to be:
14 that there are no more easy ways. The Navajos are having
15 to move into other areas to get wood. What were the areas
16 like before? Have they just used up those areas so they
17 can keep expanding on out? You are going to hit an end,
18 the same thing with the range. You are going to hit an end.
19 It's the same thing with the wilderness. You are going to
20 hit an end unless you manage it.

21 The future will hold for us a managed way and a
22 very hard way, I guess.

23 MR. RICH: You tell the Navajos that need coal or
24 wood--

25 MR. MOELLER: I don't want the hearing to

1 degenerate into a general discussion. If you have
2 testimony to give, you may give it. But I would like to
3 restrict it to just testimony being taken this evening.

4 Is there anybody else with any prepared testimony?

5 If not, I will declare this hearing adjourned.

6 Thank you very much for your attendance this evening.

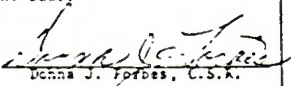
7 (Whereupon, the hearing was adjourned.)

8 * * *

1 REPORTER'S CERTIFICATE

2
3 STATE OF UTAH)
4 COUNTY OF SALT LAKE) ss.

5
6 I, Donna J. Forbes, a Certified Shorthand
7 Reporter, holding License No. 179, and Notary Public in
8 and for the State of Utah, hereby certify that I attended
9 the hearing of the aforementioned matter at the time and
10 place set out therein; that thereat I took down in short-
11 hand (stenotype) the testimony given and the proceedings
12 had therein; and that thereafter I transcribed my said
13 notes into typewriting and that the foregoing transcription
14 pages, numbered from 3 to 42, inclusive, is a full, true,
15 and correct transcription of the same.

16
17 
18 Donna J. Forbes, C.S.A.

19
20 Dated at Salt Lake City, Utah, this 16 day
21 of May, 1980.

22 My commission expires:

23 3-11-83
24
25

FINAL STATEMENT

KANE COUNTY COMMISSION'S RESPONSE TO U. S. DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT-ARIZONA ARIZONA STRIP WILDERNESS DRAFT E.I.S. and Suitability Report.

Having received this report on April 22, 1980, we take serious exception to the demands that are imposed upon us by having such a short period of time in which to respond. Two weeks is hardly an adequate period of time to study, much less respond to such a wide-ranging report that shall have impacts upon Kane County for years to come.

This report has been received virtually simultaneously with the Bureau of Land Management's Wilderness Study Areas report for the state of Utah requiring response by the last of June. For Kane County, this means 45 individual responses. In addition, we have received from the Cedar City office of the Bureau of Land Management, a request for response regarding the Alton Cmel Project and our attitude regarding Alternative # 4. On April 24, Kane County received the Summary Report of the Range Management Program of the Vermillion Planning Area for the Arizona Strip Bureau of Land Management. All of this comes at a time when we are required to prepare a report on the interis study of the National Park Service on the Transportation and Accommodation Study for Zion National Park.

In brief, Kane County submits that you are not wanting comment from us. You are founding us with reports requiring responses in the hope that we will throw up our hands and acquiesce—just as State Director, Gary Vicks said in his public comments at the Seminar held on the campus of Utah State University on April 24, 1980. He appeared as a speaker for "Revolution or Evolution: The State Role in Integrated Planning for Resource Use."

We resent this attitude. We intend to make formal complaint regarding it.

SUMMARY:

After a cursory review of the draft statement, the Kane County Board of County Commissioners expresses strong unequivocal support for Alternative # 3. After consideration there is no other alternative possible. We will follow the format laid out in the draft statement to respond.

With reference to the Environmental Consequences, we reject the statement that wilderness values should have precedence in water resource development for cattle and wildlife. The impacts to the cattle industry generated by the previous haphazard mandates of the Bureau of Land Management have been extremely harsh. To see this policy written out in statement form is a hard load to bear.

KANE COUNTY COMMISSION RESPONSE ARIZONA STRIP WILDERNESS REPORT PAGE THREE.

SCOPING:

It is extremely interesting to note that whenever there is any action relative to Kane County and the people therein, the scoping meetings are held in such close proximity to the County as Phoenix (463 miles away), Flagstaff (204 miles away), Page (84 miles away) and St. George (82 miles away). The cattlemen involved in the Paria Canyon area are residing on a permanent basis in Kanab, the county seat for Kane County. Yet, the meetings are always held at some far-distant site for the convenience of the Bureau of Land Management and not for the benefit of the people who will be most sorely impacted by these decisions.

SECTION 3: AFFECTED ENVIRONMENT.

AIR QUALITY:

The statement in the draft indicates that there has not been any air quality studies of the individual sites. Yet, the decisions that are being made will be by suppositions predicated on data collected 15 to 25 miles away. The classification of Class II category is not being contested. However, any subsequent attempt to change the classification to I would be contested.

15 TOPOGRAPHY AND GEOLOGY:

The thoroughness of the study is cast into shadow here with the report that only gypsus is in the area interbedding shale and sandstone. Our preliminary reports indicate that there are possible deposits of oil, gas and uranium in this general area. Also, the Navajo Sandstone is a renowned collector of water, acting as a reservoir for all of this area. No mention was made of this impact.

MINERALS:

The lack of tests is no indication of the presence or lack of oil and gas in an area. The test drilling throughout Kane County would preclude the existence of oil, gas, uranium, copper, vanadium and other minerals in this general area. To lock this area into wilderness at this time without any knowledge of what is being located in it tantamount to criminality.

Lead and copper have been found in deposits north of the area comparable to the geology of the Paria Canyon. This would presuppose the existence of copper and lead in the canyon. There is a correlation of uranium to copper deposits. Uranium has been found in deposits north of the canyon.

SOILS:

The draft statement indicates that the soils in this area have a moderately "rapid to rapid permeability, a low water-holding capacity, low fertility, and a high susceptibility to wind and water erosion". And yet, the Bureau of Land Management is proposing to impact this area even more by promoting and directing an unknown number of hikers into the area to increase the erosion factors already present.

KANE COUNTY COMMISSION RESPONSE ARIZONA STRIP WILDERNESS DRAFT PAGE TWO.

The additional restriction of resource exploitation and production in eastern Kane County is unacceptable. Our preliminary research indicates that there is the strong possibility of oil, gas and uranium in the area as well as gypsus. This scrupulous attitude is predicated on nothing more than a wilful whim of resource planners in the Bureau of Land Management.

The third item is especially important to our way of thinking. If you or any other individuals are interested in preserving an area in wilderness, then don't designate it. By designation, you are inviting pollution, vandalism, destruction, erosion and nullifying your original action. This area has been kept in a "pseudo-wilderness state" since man first came on the scene in 1000 - 800 B.C. By designation you will destroy this area as the high Sierras were destroyed along the John Muir trail by the greedy and avaricious over-utilization by the Sierra Club for pecuniary advancement. The few motorized vehicles in the area will have far less impact on this area than the myriad of hikers following the Navasatch Wilderness guides down the trails.

Legislative action on wilderness does not protect an area—it destroys it. At what point will the Bureau of Land Management ascertain the carrying capacity for the Paria Canyon area and when it has been surpassed. To keep the area pristine, keep quiet about it.

Item # 6 is also highly significant: "Increase visitor use in Paria Canyon, which could increase vegetation destruction, erosion, soil compaction, fire rings, vandalism, litter and human waste and fire potential." What are you doing to our lands?

The conclusion for this section indicates that there would be no significant economic impacts on livestock grazing or mining. This is conjecture that is not known at the present time. This is not predicated on fact—because all of the facts are not yet in.

SECTION 1: ALTERNATIVES INCLUDING THE PROPOSED ACTION.

PURPOSE AND NEED:

The Kane County Planning Commission and the Kane County Board of County Commissioners have indicated that this general area is to be designated as Forest Recreation or multiple-use lands. Under the Federal Land Policy and Management Act, the Bureau of Land Management is proposing a single use in contravention of the local land-use policy. The local land-use policy is not in violation of the federal laws. We respectfully submit that the Bureau of Land Management reconsider their actions regarding the Paria Canyon area of Kane County.

DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES:

We reject Alternatives # 1 and # 2 as being in contravention of the Land-Use policies of Kane County. Therefore, we can only support Alternative # 3—No Action.

KANE COUNTY COMMISSION RESPONSE ARIZONA STRIP WILDERNESS REPORT PAGE FOUR.

WATER RESOURCES:

Five to seven cubic feet of excellent chemical quality water per second is extremely good water—water that is essentially going unused. This water could and should be used for cattle production as well as to service the mining operations that would be possible in the area. The waters of the entire canyon are of such a nature that their highest and best use is not to flow gently into the Gulf of California.

16 VEGETATION:

The data contained on Table 3-1 is inconclusive, overly broad and definitely general. By definition (as contained in the glossary) there are several categories of sensitive plants contained in the Paria and Vermillion areas. But your definition states: "Plants whose populations are consistently small and widely dispersed on whose ranges are restricted to a few localities, such that any appreciable reduction in numbers, habitat availability, or habitat condition might lead toward extinction. Sensitive plants also include species rare in one locality (such as in Arizona) but abundant elsewhere." (Italics added by this report writer only).

It is apparent that there are three separate categories of plants designation, one of which would place the plants in possible peril. It is our contention that the research here is sloppy and better identification should be taken care of.

17 ANIMALS:

The report in this area is inconclusive as well. Table 3-2 identifies eight categories of animals that are on the Federal or Arizona endangered or threatened species lists. Yet, there is no detailing as to where these animals make their habitat—Paria, Vermillion or Paria. The narrative fails to address this situation as well as the Table in an adequate manner. Additionally four of the five species identified in the Paria area are contained on the Arizona threatened list and thus have no application within the state of Utah.

CULTURAL RESOURCES:

Minor archeological sites are of such importance to us and our neighbors in the Kaibab Paiute Tribal Council as to recommend that you use discretion and judgment. If that, site location of these areas should not be placed on your maps. The idea of a repulsive grave-robbing muckling through these historical sites is abhorrent. If these sites are to be opened, they should be opened only under the jurisdiction and with the dedication of a professional archeologist. If these sites are adjacent or visible on the regular trail or easily accessible from the trail, then this trail should be closed until such time as the sites can be properly excavated. The blatant attitude of throwing this area open for indiscriminate adventuring and promoting as wilderness reconstitutes a threat to these archeological sites. By what this is a prime argument for maintaining this area on a status quo basis.

Since the time of John D. Lee and the establishment of Lee's Ferry the local residents have been in this area of Paria and Vermillion Cliffs. Those sites are still there for you to see. And yet, allow the random travelers to come to a pristine area and he leaves his mark of destruction and his name boldly written behind him. The cattlemen of the area have known of these artifacts of prehistoric man of the area and have left them alone. It is to be trusted that the same would hold true today.

Our recommendation is to preserve the archeological sites to maintain this area as it is presently constituted, dealer on the advertising of the area and promote the multiple-use concept of the entire area.

LANDSCAPE CHARACTER:

This report prepared by the Bureau of Land Management is the epitome or smith of cavalier attitude to minimize those things that "we want to ignore" and stressing those things "we think are important." The imprint of man are substantive throughout this entire area. This was the route that John D. Lee historically used to visit between his wives—one at Lee's Ferry and Moenkopi and two wives at Skutumpah. His imprint is still visible in the area. The ranchers since have established water developments, roads, corrals, fences and other improvements to enhance their cattle resources. This entire area has been so, if allowed, will continue to be an asset to the cattle industry of Kane and Coconino counties.

18 LAND USE:

The data contained in Table 3-3 is subjective judgment predicated on an individual's personal value system. Some individuals in the county have indicated that the Paria is an extremely interesting and challenging area for ORV's and yet it is classified as only fair by the evaluation contained in this report. The archeological sightseeing always is not JUST sightseeing and therefore, should not be included in this classification. Big game hunting and geological collecting were not evaluated in this region and yet it would appear that there would be things of interest to the rock hound according to the reports that we have received from the United States Geological Survey and to the Utah State Mineralogical and Geological Survey. It is our conclusion that this area of the study is incomplete and should be readressed.

Table 3-4 confirms our thesis that increased advertising and promotion of the area will increase the impacts upon this general area. 11,528 visitor days in 1978 is unnecessary. When will this canyon area reach the point of diminishing return when through protection you have ruined an area worth preserving?

19 In the commentary for ORV, the statement seems ambiguous to out-right confusing. Paria Canyon received a fair rating for ORV use but is closed to ORV's. The plateau on the other hand, requires four-wheel drive for safe travel throughout, since great canyons of sand drift across the plateau. The plateau, however, is remote, lacks water and support facilities, and is not ideal for ORV use. Thus, it received a Good rating for ORV use. Congratulations!

It is to be assumed that Paul Harvey would enjoy this classic case of government double talk to avoid a conclusion that does not fit the assumption.

or federal fiat. We submit that historic utilization patterns have precluded multiple-use of the land in some areas. We feel that such status would remain regardless of man's efforts. Additionally, our assessment of the land and its resources indicates that there are areas that should and shall receive special consideration from the County Commission and the County Planning Commission. However, we reject as asinine, futile and the nadir of proper land management, the designation of these lands as wilderness to promote increased detrimental utilization of these areas.

Further, if wilderness is a "good" and if wilderness is needed and if wilderness is a desired element in and of itself, then we submit that such wilderness areas are and of a right out to be located adjacent to and in proximity to those that would be using them. Fuel economy and other federal constraints that are prevalent in today's society dictate that if these areas are needed then place them in New York state, New Jersey, Rhode Island or wherever—but do not isolate them half a continent away from those that would be using the areas.

22 EMPLOYMENT AND INCOME:

The unemployment data contained in the Bureau of Land Management Report is incorrect. 152 unemployed would never be classified as low in most economic books, but then we are dealing with the different world of the bureaucrats.

It is apparent that the annual income for the area is extremely low—38% of the families in Kane County are classified as being below the Federal poverty level. Any impacts of an unfavorable nature will have a severe ripple effect.

SECTION IV: ENVIRONMENTAL CONSEQUENCES

The Kane County Board of County Commissioners has several areas in this section that they wish to comment upon. Some of the comments will be repetitious; however it is determined that we should follow the format as delineated by the Bureau of Land Management in this Arizona Strip Wilderness Study.

PROPOSED ACTION:

The Kane County Commissioners take exception to the following points raised in this area:

- 1) The preclusion of all mineral (especially oil and gas) exploration and development is to our way of thinking wasteful of the natural resources of the area and fatal to the philosophy of national self-sufficiency. We reject this concept.
- 2) The transplating of big-horn sheep may be construed as a futile effort especially in light of previous Bureau of Land Management attempts to bring the sheep into this general area.
- 3) The VNM Class 1 guidelines are to our way of thinking an inappropriate concept utilized for the purpose of undue control of non-wilderness characteristic lands.

Finally, in this area, the comment in the commentary discussing national publicity as responsible for attracting people to the Paria Canyon area, confirms our hypothesis: DESIGNATION DESTROYE.

20 LIVESTOCK GRAZING:

The inconsistencies continue throughout the Bureau of Land Management's report. Earlier it was stated that the wilderness designation would do no economic harm to the area and yet on page 27 and 28 the report states that three operators run livestock at or near the upper end of Paria Canyon; four operators run on the rim-rocks above the canyon; and one operator runs livestock at the lower mouth of the canyon. It would appear that eight ranchers are involved in this area. Eight ranchers would be curtailed from maximum utilization of the area because of wilderness designation. Eight ranchers!! In addition, the Bureau of Land Management is discussing 23,042 acre privileges for ALM's. This is not supposed to be substantive? This is not supposed to have any economic impact? It is obvious that the researchers and writers within the Bureau of Land Management do not have to make a living with cattle—just paper. This is an impact!!

21 LAND USE PLANNING, CONTROLS, AND CONSTRAINTS:

Here again the data of the Bureau of Land Management is inaccurate. This Paria area is zoned at the present time (in Kane County) as Forest Recreation (FR-3). The amendment to the Zoning Map that is being completed and up for final approval by May 20, 1980 shall have the area zoned as Multiple-Use (MC-160). Kane County does not have any Open Space Recreation.

ECONOMIC CONDITIONS:

At the present time (March 31, 1980) the unemployment factor in the Kanab-Panguitch region (Kane County principally) was set at 15% and climbing. And yet, the Bureau of Land Management through selective management programs is intent upon impacting even more the economic stability of the area for time to come by phasing out or hindering the operations of eight ranchers of the area.

PUBLIC ATTITUDES:

It is felt that this response to the Bureau of Land Management report is an exercise in futility. "It doesn't matter what you say, they already have their minds made up!" The Sagebrush Rebellion was not brought into being because of the equitable and reasonable attitude of the Bureau of Land Management, the Forest Service and the National Park Service. Big Brother does NOT know what is best for us. Nor should big government listen to the few vocal individuals of Washington to the exclusion of the people who have to live with and work on the land.

We express strong opposition to excluding multiple-use: cattle and mineral development, predicated on some esoteric and recanted formulation of the elitist few for the affluent few. We restate the concept of exclusionary singular use of the land and the land's resources by congressional command

ALTERNATIVE I—BOUNDARY ADJUSTMENT

The Kane County Board of County Commissioners formally reject this alternative. This action is predicated on the fact that the proposal is in contravention of county land-use ordinances and is not deemed to be in the best interests of the people of Kane County.

ALTERNATIVE II—CONTIGUOUS LANDS

The Kane County Board of County Commissioners formally reject this alternative. This action is predicated on the fact that the proposal is in contravention of county land-use ordinances and is not deemed to be in the best interests of the people of Kane County.

ALTERNATIVE III—NO ACTION

The Kane County Board of County Commissioners formally accept this Alternative. It is in compliance with existing ordinances and is supportive of the multiple use of the lands involved.

23 AIR QUALITY

The Kane County Board of County Commissioners disputes the contention set forth in this discussion on page 52. "Wilderness designations do not reclassify areas." This is totally true. The Environmental Protection Agency reclassifies areas. When the E.P.A. Regional Director from Denver visited in Kanab he categorically stated that any wilderness areas would be designated as Class 1 Air Quality by his office. Thus it would appear that wilderness designation may not reclassify areas, but they are the causal elements involved in the reclassification.

24 MINERALS

The County Commissioners would take exception with the policy stated by the study report with reference to mineral production in the Paria and Vermillion Cliffs areas. This has been a deliberate policy position of the Bureau of Land Management. The oil and gas that are in the area could and should be developed. They would be developed with the current price of gas on the world market if they were allowed to do so. The argumentation in this section is inappropriate.

CULTURAL RESOURCES

The point made in the Bureau of Land Management report additionally supports our contention that designation will destroy this area. "The main impact of the proposed action and alternatives 1 and 2 on cultural resources would be more vandalism from increased visitor use." Wilderness designation automatically precludes this type of activity and worse. With reference to this, we reject Alternative 2 even more vehemently because of the impacts it would have on the future peoples. "Alternative 2 (contiguous lands) would increase the potential for inclusion of sacred sites, plants and animals in a wilderness area and would also increase the number of cultural sites susceptible to vandalism..."

LANDSCAPE CHARACTER

VISUAL RESOURCES

Here again the Bureau of Land Management confirms our basic thesis that designation destroys. "On the other hand, if the wilderness designation attracts more people to the area, littering might increase and more permits might be required to control resource abuse." Earlier in this report it was noted that since the drama began beating about the "Paria Wilderness" that the visitor use has increased. This is a foregone conclusion that wilderness designation will enhance and foster increased visitations to the area. The result will be an additional level of bureaucracy to administer the wilderness areas with permits and other controls to prevent resource abuse.

VRM CLASSES

The earlier comments from the Kane County Board of County Commissioners applies here. We reject this entire concept as an additional mechanism to control non-wilderness characteristic lands. This is as odious and incivious as the Clean Air designations.

WILDERNESS

"Wilderness designation of the study areas would benefit all wilderness values by legislatively protecting them." While admirable in intent, the actual fact would be that designation would serve to destroy those very areas that we all feel should be cared for.

PARIA CANYON PRIMITIVE AREA

The National Park Service has experienced failure in their attempts at population dispersal throughout the various parks that they administer. Zion National Park is going through this trauma at the present time. They have determined that having good roads and excellent scenery is not sufficient to move the people away from the "focal points". Increasing acreage is a false assumption for dispersal of the visitors throughout the entire region. The nature of wilderness precludes additional "focal points of interest" to attract the visitor sufficiently to move out and away from the narrow corridor of the canyon. In response to the Zion National Park's DCP and Transportation Study, the Kane County Commission recommended that mini-visitor centers be established and that additional commercial ventures be set up at those points where the park personnel were interested in moving the people to get them away from the twelve-mile drive up Zion Canyon itself. Therefore, the conclusion and recommendation of the Kane County Board of County Commissioners is that any attempt at dispersal will fail without foregoing the wilderness concepts. The Commission would be opposed to additional visitor-centers in the Paria and Vermillion Cliffs area. The Commission would not support commercial ventures in this part of Kane County. In fact, any such establishment of commercial ventures would have to be reviewed by the County Planning Commission and the County Commission. There are some difficulties with the County Master Plan and such enterprises. Once more, the Commission opposes the development of wilderness because of the damage that will be done to the area by visitors.

LIVESTOCK GRAZING

The actions of the Bureau of Land Management could have severe impacts upon the operations of the individual ranchers using this area. The cavalier attitude of the Bureau of Land Management is extremely frustrating especially when they state, "Should determine development conflicts with wilderness and visual requirements. Alternatively it could stop such development on the Vermillion Cliffs and Iron Ranch allotments, frustrating the implementation of proper livestock management. Moreover, banning motor vehicles on roads and ways would inconvenience ranchers in livestock management."

These actions would not inconvenience ranchers in livestock management, they would serve to nullify any ranching operation in the area. It is beyond comprehension why this is not explicitly clear to those who have prepared the draft EIS.

ECONOMIC AND SOCIAL CONDITIONS

ECONOMIC CONDITIONS:

Somewhere, sometime, somehow the economists working for the Bureau of Land Management will have to come out into the real world. The impacts on Kane County's economy will be telling when we discuss the eventual closing out of 21,042 active privileges for AUMs. The attitude of the Forest Service was to retire permits with deaths and not to allow the areas to continue in use. It is safe to assume the Bureau of Land Management has a similar attitude. This will be a severe impact ultimately for the cattlemen involved and for the county generally.

Alton Frazier, Director of the Utah Travel Council, disputes the total value to an area predicted on the back-packer. As a point of reference it was felt that even in today's inflated market, Kane County and Coconino County would be lucky to experience even as much as \$1.75 per day per hiker. This is compared to a regular touring family that normally will leave behind about \$52 per person per day.

However, using the figures submitted in the report, by the year 2000 the Paria Canyon area would have 77,138 people visiting it for extended periods. Once more, the Bureau of Land Management justifies our contention that designation will destroy the area.

Finally, we reject the contention in the final paragraph stating that the proposed action nor the alternatives are expected to have significant impacts on livestock grazing or mining.

PUBLIC ATTITUDES:

Throughout this response, the Kane County Commissioners have been delineating the public attitude with reference to the proposed wilderness designation of the Paria Canyon and Vermillion Cliffs areas.

LAND USE

RECREATION:

The Kane County Board of County Commissioners takes exception to the conclusion arrived at by the researchers for the Bureau of Land Management when they state, "They found that wilderness designation would more permanently protect wilderness values than existing primitive and natural area designations."

Since the time of John D. Lee who first explored this region in the 1870's this area of Paria and Vermillion Cliffs have retained their pristine and natural qualities. This area has been used for over a hundred years by cattlemen and hunters of the area. In that period, the character, quality and uniqueness of the region has not been disturbed nor has it been harmed irreparably. Yet in the last eight years, damage has been done to the quality of this area AFTER it was designated as a primitive area by the Bureau of Land Management. According to the records of the Bureau of Land Management, there were 11,528 visitor days to the canyon in 1978 (the last year for records). This is not protection--this is destruction, just as the Bureau of Land Management has been anticipating throughout this draft EIS. We submit that this is irresponsible management. It is destruction of those qualities and values that were protected and preserved by the cattlemen and local residents over the past 100 years. In nine years the trend has been reversed.

PRIMITIVE VALUES:

The Bureau of Land Management has failed to prove their thesis that they would be able to PROTECT AND PRESERVE this area by its designation as wilderness. Even if there were natural resource development in the area, the people of Kane County are far more conscious of tourist-oriented values than what the Bureau of Land Management seems to be. Range developments and roads through the upper part of this region would have far less impact upon the qualities of the wilderness values than the rapacious, increased utilization of the area that would result from designation as wilderness.

VISITOR USE:

"Increased visitor use could result in vegetation destruction, erosion, soil compaction, and increased fire potential in Brother Canyon, increased unsightly campfire and fire rings, increased vandalism to cultural sites, and increased litter and human waste."

This confirms our contention. If the Bureau of Land Management insists upon defiling this area by pushing the wilderness designation, then the Board of County Commissioners may have to take action to secure some semblance of primitive beauty by drafting and adopting an ordinance mandating minimal human impacts in these areas. This would be adopted for the preservation of health and safety of those using these areas.

CONSULTATION AND COORDINATION:

The prestigious listing of those who were consulted with and coordinated with in the preparation and review of the Draft Environmental Impact Statement is devastating. Counting the Congressional delegations as individuals, our counting is there are 97 different individuals or agencies that were contacted. The list ranges from the Audubon Society through the Wildlife Federation, bureaucrats on state and federal level and Hurricane Town Council and the Iron County Extension Service and many others. And yet, Kane County whose ordinances under the Federal Land Management and Policies Act have to be complied with were not notified, consulted or allowed to review the on-going process. It is fortunate that we were allowed by some happenstance to have an opportunity to respond to the Draft Environmental Impact Statement and Sustainability Report. Also excluded from this long listing was the City of Kanab that would be more directly impacted by these actions the Iron County Extension Service or the Leash Walton League of America. We take exception to the exclusion.

APPENDIX 1: SUMMARY OF MANAGEMENT AND DIRECTION

3. LANDS

- Investigate State land inholdings and Water and Power Resource Service (WPRS) withdrawals to determine the best means for BLM to obtain complete jurisdiction.

The Kane County Commission would oppose any action along this line. We submit that the state lands should be kept inviolate where they are at the present time. Further, we see no justification for BLM control of the Water and Power Resource Service withdrawals.

4. MATERIALS AND GEOLOGY

- Before revoking withdrawals, segregate portions of the canyon not adequately withdrawn from mineral entry.
- Invalidate existing mining claims, when necessary.

Both actions are opposed by the Kane County Commission because inadequate study has been done to determine the extent of the mineral resources and values present in the area.

6. WATER

- Show spring locations within the canyon on the brochure. [Recommend that all water, including spring and river water, be boiled or treated before drinking.]

Under the provisions of the law mandating that the Kane County Commission would be responsible for the health and safety of the citizens living in or visiting the area, we cannot allow this. Either the water is of good quality for the people or it is not to be made available to them.

7. RANGE

- a. Remove existing livestock use within the bottoms of the Buckskin Gulch and Wire Pass drainages. Remove livestock from all but the lower 11 miles of Paria Canyon.
- b. Require the permittee to remove the salt from its present location in Wire Pass drainage.
- c. Fence the east side of House Rock Valley Road and the Buckskin pastures of Mollis's Wipple allotment.
- d. In the Hunting Well allotment, place fences to keep cattle out of Paria Canyon. Also relocate the existing corral to a more satisfactory site. Develop a new water source on the rim to the east.

It is apparent that all of these actions are being taken for the benefit of the backpacker to the detriment of the cattlemen of the area. We oppose all of these actions because of the adverse impacts that there will be from them.

8. RECREATION

- a. Study the carrying capacity of the canyon and closely monitor sanitary needs.

The Kane County Commission submits that this action should have already been done. This should not be done after designation, but rather before so that all of the impacts could be explored thoroughly prior to actions of the congress.

- f. Revise the Paria Canyon brochure to provide health and safety warnings, search and rescue instructions, management rules and regulations, interpretative information, and a usable map of the canyon.

The Kane County Commission submits that the wilderness designation will severely impact the search and rescue operations of the law enforcement personnel of Kane and Coconino Counties. Previous rescues have involved helicopters and other mechanized vehicles. This designation will impede greatly the efforts of the rescue organizations.

- b. Remove or minimize hazardous conditions in the canyon as they are identified.

The Kane County Commission opposes this action. In doing such "removal" the Bureau of Land Management is changing parts of the character of the areas that earned them the threat of designation as a wilderness area. It is our contention that the canyons should not be altered for convenience. If there are hazards that have been identified, then the people should be made to stay away from them.

1. Periodically patrol the canyon to pick up garbage, and encourage visitors to leave the canyon cleaner than they found it.

The necessity for inclusion of this item once more confirms our original thesis. For 100 years, it was unnecessary to patrol the canyon periodically to pick up garbage. It is only after the area has been designated as primitive that this need arises. We submit that to maintain the wilderness characteristics and qualities of the area, the Paria and Vermillion Cliffs areas should be returned to their status prior to designation as primitive. Designation destroys.

1. Close the canyon to motorized vehicles.

- e. Improve roads to the northern trailheads.

- p. Construct trail segments in the lower 12 miles of the canyon.

We reject these three segments. The first on behalf of the cattlemen of the area. The second two because if the area is designated as wilderness then the area should be kept primitive not developed for the convenience of the backpackers who would be using the area.

- a. Develop trailhead facilities at northern entrance points in Utah and coordinate with the National Park Service to develop entrance facilities of Lee's Ferry.

It is anticipated that the Bureau of Land Management under the provisions of FLPMA will work with the Kane County Planning Commission, the Kane County Building Official and the Kane County Commission in securing the necessary permits and complying with County ordinances.

CONCLUSION:

The Kane County Board of County Commissioners respectfully submits that the Bureau of Land Management in their Arizona Strip Wilderness Draft: Environmental Impact Statement and Suitability Report have failed to prove their thesis that the Paria Canyon and the Vermillion Cliffs areas are suitable for wilderness designation. In point of fact, the reverse is the case. Throughout their report they have consistently delineated the position of the Kane County Commission that such designation would serve to degrade if not ultimately to destroy these areas that have been preserved even though utilized over the past 100 years. We are opposed to the wilderness designation for the Paria Canyon and Vermillion Cliffs areas.

DRAFT SUITABILITY REPORT
AND DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR THE PROPOSED WILDERNESS DESIGNATION
OF INSTANT STUDY AREAS
FOR THE ARIZONA STRIP DISTRICT,
MOHAVE AND COCONINO COUNTIES, ARIZONA.

Public Hearing

BE IT REMEMBERED that on Wednesday, the 7th day of May, 1980, commencing at the hour of 7:30 p.m. thereof, the public hearing in the above-entitled matter was held in St. George, Utah at the Four Seasons Convention Center, 747 East St. George Boulevard before Mr. Robert Moeller, Attorney at Law, Field Solicitor's Office for the United States Department of the Interior, Phoenix, Arizona.

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PANEL MEMBERS

Mr. Dennis Carter
E. I. S. Team Leader
Arizona Strip District

Mr. Glenn Carpenter
Co-ordinator
Arizona Strip District

Mr. Larry Royer
Wilderness Co-ordinator
Cedar City District

Mr. Bill Templeton
District Manager
Arizona Strip District

PROCEEDINGS

MR. MOELLER: Will this hearing please come to order?

Let the record show that this hearing has been convened on May 7, 1980, at 7:30 p.m. at St. George, Utah at the Four Seasons Convention Center, 747 East St. George Boulevard.

On behalf of the Bureau of Land Management I would like to welcome you this evening to the public hearings on the Draft Suitability Report and Draft Environmental Impact Statement for the Proposed Wilderness Designation of Instant Study Areas for the Arizona Strip District, Mohave and Coconino Counties, Arizona. The areas included are Paria Canyon Primitive Area, Palute Primitive Area, and Vermilion Cliffs Natural Area.

Prior to this evening, we have held hearings at Salt Lake City, Utah on May 5, in Kanab, Utah on May 6. After this hearing we will hold another hearing in Phoenix, Arizona on May 8 at 7:30 p.m. at 111 South Third Avenue.

In addition, the Bureau of Land Management has scheduled two additional hearings, one to be held on June 3, 1980 at 7:30 p.m. in Kingman, Arizona at 1971 Jaggerson, and another hearing on June 4, 1980, in Flagstaff, Arizona at 1010 East Santa Fe at 7:30 p.m.

The Bureau of Land Management is extending the

comment period on the draft documents until 30 days after the United States Geological Survey and Bureau of Mines' Mineral Report is made available to the public, and the date that that report is made available will be published in the Federal Register. If you don't wish to testify this evening, and if you would wish to submit written comments, they can be submitted during this period. The record for the hearing is being held open, and those written comments can be sent to the State Director's Office, Bureau of Land Management, 2400 Valley Bank Center, Phoenix, Arizona. The zip code is 85073.

These hearings are authorized by the Wilderness Act of 1964 and the Federal Land Policy and Management Act of 1976 and the National Environmental Policy Act of 1969. The purpose of the hearing is to receive public comment on the Draft Suitability Report and Draft Environmental Impact Statement.

Witnesses wishing to testify this evening may do so. There is a ten-minute time limit on your testimony. Just to get a few mechanics out of the way, I would like you when I call your name if you have registered to testify, to come up to the podium here, give the court reporter your name and how it is spelled, and if you are representing a particular organization and wish to state that, give the name of the organization that you are representing.

1 I would like to introduce the panel this evening.
2 They are here to personally receive your comments and to
3 listen to your comments. All of them have been involved
4 in this statement in one form or another. To my left is
5 Dennis Carter who is the E.I.S. Team Leader for the Arizona
6 Strip District. Then there is Glenn Carpenter who is the
7 Wilderness Co-ordinator for the Arizona Strip District.
8 Larry Royer is the Wilderness Co-ordinator for the Cedar
9 City District, and to my right is Bill Templeton, the
10 District Manager for the Arizona Strip District. All of
11 them are from the Bureau of Land Management.

12 My name is Robert Moeller, and I am an attorney
13 with the Field Solicitor's Office for the United States
14 Department of Interior in Phoenix.

15 We have several people that have expressed a
16 desire to testify this evening. You will be allowed to
17 question the members of the panel in a relatively narrow
18 area, and that deals with asking questions of points of
19 clarification regarding the statement. This isn't an
20 adversary hearing, and so cross-examination of the panel
21 isn't going to be permitted regarding the particular merits
22 of this statement, but if you wish to have points clarified
23 or factual points elicited from the panel, I will permit
24 those types of questions.

25 Our first witness this evening is Celia Ryan.

5

1 Celia Ryan.

2 MS. RYAN: My name is Celia Rencher Ryan, and I
3 am from Washington County, and I am speaking as the
4 Washington County Co-ordinator of SOURCE, Southern Utah
5 Residents Concerned about the Environment.

6 In regards to the Paria Canyon Wilderness Draft,
7 we strongly support Alternative 2 in the Draft E.I.S. It
8 is our belief that the protection evolving from such a
9 wilderness designation would involve no losses to produc-
10 tivity but rather promote and enhance long-term productivity
11 due to protection management.

12 It is presumed in the Suitability Report that
13 livestock grazing is compatible with wilderness designation.
14 In consideration of the environmental consequences on the
15 development and maintenance of water in the grazing
16 allotments, we stress that the feasibility studies are
17 carried out in full co-operation with the leaseholders.

18 We feel that the maintenance of the existing
19 water reservoirs and catchments can be carried out with
20 little or no effects on the area's wilderness values. It
21 is obstinate and narrow-minded to think that wilderness and
22 grazing are not or could not be compatible. It's been
23 going on for well over a hundred years in the West. To
24 think that the term designated wilderness will change that
25 compatibility is just more "anti-government" rhetoric.

6

1 As a result of the visitor use doubling in the
2 Paria Canyon during the past eight years and the Navajo
3 land application, we feel it is pertinent that Alternative
4 2 be adopted as a means of protecting the existing
5 wilderness characteristics.

6 The land is a living entity and we cannot just
7 take, take, take year after year after year. We must also
8 give with respect and thankfulness.

9 We should not pick Nature's pocket, rather we
10 should borrow and repay in the form of protecting. The
11 philosopher Goethe sums it all up in this profound
12 statement: "Nature is the living, visible garment of God."
13 It is our duty to keep the garment pure and in good repair.

14 MR. MOELLER: I will go ahead and label these as
15 Exhibit A and include your written comments as part of the
16 record.

17 The next witness is Pat Heidenreich.

18 MS. HEIDENREICH: I would like to defer my
19 statement until the end of the public comment period.

20 MR. MOELLER: Mr. Duane Blake, you have a
21 question mark on whether you want to testify or not.

22 MR. BLAKE: I just more or less have some
23 questions for clarification is all.

24 MR. MOELLER: Come on up.

25 MR. BLAKE: Under the Summary of Management and

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1 Direction under Minerals and Geology C: Invalidate
2 existing mining claims when necessary. It was my under-
3 standing that any existing mining claims that were valid
4 would stay. Now, is this right, Dennis? That raises a
5 question in my mind.

6 MR. CARTER: By "invalidate" you would simply
7 show that the claim was not a valuable mineral deposit and
8 then wipe out a claim that was of no value anyway.

9 MR. BLAKE: Under Range in E where it says
10 "Place fences to keep cattle out of Paria Canyon--"

11 MR. MOELLER: What page are you on?

12 MR. BLAKE: Page 71. And under A, "Remove
13 existing livestock use within the bottoms of the Buckskin
14 Gulch and Wire Pass drainages. Remove livestock from all
15 but the lower 11 miles of Paria Canyon," and this is also
16 contradictory that livestock wouldn't have any effect on
17 the designation of wilderness, and vice versa. Dennis
18 partly explained that to me, but I think there should be
19 some clarification made in the statement, because in
20 essence we may be setting an example to some degree for
21 other designations of wilderness by excluding livestock.

22 MR. CARTER: My understanding is that this has
23 already taken place, and that was not necessarily the
24 request, but it was done in co-operation--

25 MR. BLAKE: Why should we even have that part of

8

1 the statement? I would rather not even have it part of
2 the statement.

3 MR. CARTER: Okay.

4 MR. BLAKE: And under recreation under H, it
5 said, "Remove or minimize hazardous conditions in the
6 canyon as they are identified." Yet, on Page 72 over here
7 under Recreation under S, it says, "Have help available in
8 the event of serious injury or death, but do not attempt
9 to protect the visitor from natural hazards, since the
10 primitive area concept implies that a person in wild
11 country must depend on his own skills." That seemed
12 contradictory, too.

13 MR. CARTER: The idea under elimination of
14 hazard in H is to eliminate man-made hazards and the
15 hazard possibly of individuals being in a canyon in a time
16 when it was going to be flooding.

17 MR. BLAKE: They didn't spell it out here just
18 what they meant.

19 MR. CARTER: Okay.

20 MR. MOELLER: Thank you, Mr. Blake. Is there
21 anybody else that wishes to testify this evening that hasn't
22 signed up, or have I missed somebody on the list here? If
23 there is anybody at all, just raise your hand if you want
24 to testify.

25 MR. SCHMUTZ: I signed the paper as I came in.

1 I was probably the last one that signed.

2 MR. MOELLER: Come on up if you would like to
3 testify.

4 MR. SCHMUTZ: My name is Ray Schmutz. I think
5 the task that these people have done has been very
6 commendable. To assemble that much material on this
7 controversial issue, and objectively, is almost an
8 impossibility, and I think they should be commended for
9 the job they have done.

10 There are one or two areas, though, where I would
11 take exception to some of the statements, and maybe I
12 should begin by saying that I personally favor Alternate 3
13 for the reason that I can't see any justification for
14 throwing away all our options. The stress seems to be
15 that this is going to be a blow to the livestock industry,
16 and I think it will. But I think livestock is a minor
17 industry. I think we are concerned with minerals, we are
18 concerned with oil, and the statement indicates that there
19 are indications of oil, petroleum products, under this
20 area.

21 By limiting the availability of those products,
22 we are throwing away an option of perhaps some energy
23 development, and the statement itself indicates that if
24 nothing is done, that there very likely will be no change
25 in any of the areas. No deterioration, particularly. 1

1 believe that is on Page 6. I am not right sure that that
2 is the correct page, but at least the statement is in
3 there that it is probably very likely that no change will
4 occur under Alternative 3.

5 So why throw away the options we have when it is
6 unnecessary? In discussing the attitude of the public,
7 the statement indicates that the local people are strongly
8 opposed to this sort of thing, but the outside people are
9 the ones that are in favor of it, and that by going to the
10 wilderness designation it would give them some psychological
11 satisfaction in knowing that it would be protected from
12 now on from any possible deterioration. I think that is
13 a pretty expensive price to pay for psychological satis-
14 faction for a few people.

15 The statement indicates that they are relatively
16 small compared to the state of the nation, but their
17 influence is broad. Now, if their influence is broad and
18 they are that small, what makes the influence broad? Is
19 it the acceptance on the part of the people who are making
20 the decisions giving them undue influence, or are they
21 influencing the total population or just those people who
22 make these decisions? I can't really accept that as a
23 basis on which to declare such vast areas as wilderness.

24 Now, the lady who spoke first indicated that
25 livestock and wilderness have existed for a hundred years.

1 I would like to be told where that has happened. So far as
2 I know, there have been no wilderness designations where
3 grazing has been going on.

4 MS. RYAN: It just hasn't been designated. It
5 is wilderness.

6 MR. SCHMUTZ: That is right. But now then you
7 are saying that the wilderness that we have now is what
8 we are talking about, but that won't be a wilderness that
9 is designated. After it is designated as a wilderness,
10 grazing will be eventually ruled out, for the simple reason
11 that you won't be able to operate, and you can't develop
12 waters. You can't build fences. The Impact Statement
13 itself indicates that it will be--I can't remember the term
14 --frustrating--maybe that isn't the one--with livestock
15 grazing, because you won't be able to do these things in
16 the Faris area. At least it indicated that eventually the
17 ponds would be filled up and would no longer support the
18 number of livestock that it does now, and grazing would
19 have to be reduced, and that is spelled out right in the
20 statement itself, indicating to me that eventually it will
21 all be taken away.

22 It does say that you could build some, if they
23 do not impact upon the wilderness characteristics, but you
24 and I know that that is the judgment factor, and regardless
25 of how the guidelines are spelled out, somebody makes that

1 decision. If it's a man that is interested one way, he
2 makes it that way. If he is interested the other way, he
3 makes it the other way, and that gives him the authority
4 to eliminate grazing if he decides he doesn't want grazing
5 there. There is nothing definite that says grazing will
6 have to continue. It may, if you can do all these things.

7 Now, you take an area that broad, and you can't
8 get over it with a motorized vehicle, and try to run
9 cattle on that large of area, and you find it's pretty
10 darned expensive to do it with a pack horse and a saddle
11 horse, and you can't get in there with a motorized vehicle.
12 You can't go in and clean out a pond. Theoretically, yes,
13 you could do that if it doesn't impact, but to do it in
14 such a way that would not impact makes it prohibitive from
15 the expense point of view, and therefore we just as well
16 face the fact that grazing will be eliminated eventually,
17 because you cannot afford to operate under those conditions.

18 Also, on Page 58 it indicates that this doesn't
19 necessarily lock up this land irretrievably and irrevers-
20 ibly, and technically that is correct. Congress can always
21 change their mind, but can you cite one instance where
22 Congress has ever taken anything out, and once they have
23 locked it up, they have ever released it again? I don't
24 know of any, and I don't think it will ever happen again.
25 So from a practical standpoint, once it is locked up in

13

1 wilderness, as they say, it takes an act of Congress to
2 get it out again, and you know what that means. So we may
3 as well face the fact that it does mean irreversibly and
4 irretrievably that it is locked up.

5 I would therefore favor Alternative 3, because
6 that gives us the option of doing what we want to do if
7 conditions justify at a later date, without losing any of
8 the values that are there under present management, and
9 allowing the present practices to continue as they are,
10 and the admissions from this statement itself indicates
11 that no loss will occur. I would therefore favor Item 3
12 and leave us the options to do what might be necessary at
13 a later date. Thank you.

14 MR. MOELLER: Thank you, Mr. Schmitt. Have I
15 left out anybody? Does anybody else wish to testify this
16 evening? Just raise your hand.

17 MS. HEIDENREICH: My name is Pat Heidenreich, and
18 I represent Southern Utah Residents Concerned about the
19 Environment, or SOURCE, and I am the Iron County
20 Co-ordinator.

21 We appreciate the opportunity to provide public
22 comment. We strongly support Alternative 2 as the most
23 appropriate recommendation for the Secretary to make on
24 these Instant Study areas.

25 I would like to address several popular

14

1 misconceptions. First, vehicular access. The areas in
2 question, due to the rugged nature of their terrain, have
3 received little vehicular use. Motorized vehicles have
4 already been banned by the primitive designation of both
5 the Paiute and Paria Areas. The Vermilion Cliffs Natural
6 Area permits vehicular traffic, but the use has been
7 slight. The Paria Plateau has been used to some extent,
8 but due to the treacherous sandy soil, its lack of water
9 and the remoteness of the area, it is not ideal for
10 motorized travel. Consequently, the designation of
11 wilderness would have very little effect on vehicular use.

12 Second, grazing. Popular rhetoric supposes that
13 wilderness designation disallows grazing. This is a false
14 impression. Grazing may and will continue in wilderness
15 areas. Be aware that the Wilderness Act provides that
16 grazing in designated wilderness areas shall continue.
17 FLPMA, however, provides only that grazing may continue
18 as one form of multiple-use. It is not given any priority
19 over other uses such as strip mining or off-road vehicle
20 use, or even withdrawals for such neat needs as an MX
21 missile base or interstate highways. It is to the greatest
22 advantage to ranchers if they honestly want to stay in
23 the ranching business, that they strongly support Wilderness
24 designation. Wilderness is a rancher's best friend.

25 Third, water. The best protection for watershed

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1 is wilderness designation because it prohibits unnecessary
2 surface disturbance. Comments which suggest wilderness
3 would cut off the water supply of a ranch or town are
4 completely fallacious. As evidence, Utah's only designated
5 wilderness, appropriately called the Lone Peak, provides
6 a significant part of Salt Lake City's water, and the
7 specific authorization for its repair and maintenance, even
8 with vehicles, is written into the designation.

9 Four, air quality. Concerns that the industrial
10 development of the surrounding area will be limited, are
11 unfounded. Wilderness designation does not change air
12 quality classes. The Department of the Interior can make
13 recommendations, but the authority for air quality
14 reclassification rests with the governors of Utah and
15 Arizona, the affected states. By law, it is a local
16 political decision.

17 Five, recreation. It is often rhetorically
18 stated that wilderness locks out certain aspects of the
19 public such as the young, the old, the handicapped and
20 the pregnant. This is another false idea. Pregnant
21 women, if they desire, are quite capable of hiking or
22 backpacking except on very strenuous terrain. Many elderly
23 enjoy a long and happy association with wilderness and are
24 strong hikers and backpackers. The very young are seen
25 not infrequently enjoying the wonders of wilderness on

16

1 horseback, an easy mode for handicapped as well. Ardent
2 hikers and backpackers will find a way to visit wilderness,
3 and stories of 10, 15-mile hikes on crumbea, although
4 unusual, are true. As taxpayers, we would object to the
5 idea that every scenic area be made accessible by road.

6 Six, overuse. It is frequently stated that
7 wilderness designation will create overuse. The number of
8 hikers, backpackers, photographers, horseback riders, bird
9 watchers, canoeists, and sightseers of geologic and
10 botanic values, are increasing rapidly. A great deal more
11 wilderness must be set aside to disperse this use as the
12 few existing wilderness regions are becoming heavily
13 impacted. Some problems of visitor use to wilderness areas
14 require thoughtful management practices to help protect
15 natural values, and this can be done by restricting visitor
16 use, educational pamphlets, et cetera. Again, the
17 designation of more wilderness units would disperse
18 visitor use, and such problems as vandalizing of archaeo-
19 logic sites and littering would not then be as severe. This
20 is particularly important as the population of this area
21 grows.

22 Seven, Indians. We strongly support the prompt,
23 fair and generous settlement of Indian claims. In regard
24 to the areas under discussion tonight, and the Navajo
25 application, we would like to point out that this area is

17

1 not historically Navajo land, but rather Kiabab, Paiute,
2 and Anasazi.

3 Eight, the "lockup." As has been previously
4 stated, the hearing tonight is to aid the Secretary of
5 the Interior to prepare his recommendation to the President
6 in regard to the use and protection of these lands. The
7 President then makes a recommendation to Congress, and
8 Congress decides. We would like to quote the last
9 paragraph of Page 58 in the E.L.S. Draft Statement:
10 "Irreversible and irretrievable commitment of resources.
11 The designation of lands as wilderness is a long-term
12 commitment of resources and land. Congress, however, can
13 change the classification. Thus, the commitment of land
14 to wilderness would be neither irreversible or
15 irretrievable."

16 I would like to reiterate that SOURCE supports
17 the Alternative 2 recommendation. We trust that the
18 opportunity will be provided for boundary adjustment to
19 these areas if the land contiguous to these is found to
20 have wilderness characteristics by the current inventory.

21 The gentleman who was just up here previously,
22 made the comment that Congress has never changed anything.
23 I would like to ask him: Has he ever asked Congress to
24 change anything? I realize they are obstinate, but one
25 does have to work at it, whether it is to start something

18

1 or change it, and Congress is allowed to change here and
2 can change. This is reversible.

3 There were several other points that the gentleman
4 made. He talked about the psychological satisfaction of a
5 few people, and he talked about the influence being very
6 broad of some of the outside people, outside groups. I
7 would like to remind him and the rest of you that these
8 outside people, so-called, and outside groups also own this
9 public land. It is theirs just as much as it is yours. It
10 is mine, and it is every person's in this room, and we have
11 a right to protect it and speak for it, whether we live in
12 New York, whether we live in California, or whether we live
13 right here in St. George, Utah. Thank you.

14 MR. MOELLER: Thank you, Ms. Heidenreich. Does
15 anybody else wish to testify this evening? I will go ahead
16 and mark your written comments here as Exhibit B, then.

17 Does anybody else wish to testify this evening?
18 If not, I will declare this hearing adjourned. Thank you
19 very much for coming tonight, ladies and gentlemen.

20 (Whereupon, Exhibits A and B were marked for
21 identification and attached.)

22 (Whereupon, the hearing was adjourned.)

23 . . .

19

1 C E R T I F I C A T E

2
3 STATE OF UTAH)
4 COUNTY OF SALT LAKE) ss.

5
6 I, Donna J. Forbes, a Certified Shorthand
7 Reporter, holding license No. 179, and Notary Public in
8 and for the State of Utah, hereby certify that I attended
9 the hearing of the aforementioned matter at the time and
10 place set out therein; that thereat I took down in short-
11 hand (stenotype) the testimony given and the proceedings
12 had therein; and that thereafter I transcribed my said
13 notes into typewriting and that the foregoing transcription
14 pages, numbered from 3 to 19, inclusive, is a full, true,
15 and correct transcription of the same.

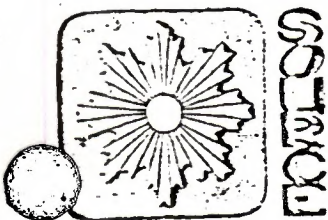
16
17 *Donna J. Forbes*
18 DONNA J. FORBES, C.S.R.

19 My commission expires:

20 3-11-83

21 . . .

20



Exh. b, 2 A.

SOUTHERN UTAH RESIDENTS CONCERNED
ABOUT THE ENVIRONMENT

Cedar City
P.O. Box 1453
84720

Celia Rencher-Ryan
P.O. Box 28
Pine Valley, Utah
84722

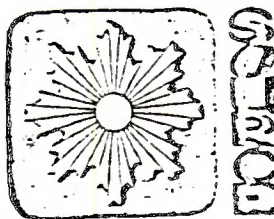
May 7, 1980
St. George, Utah

I am speaking as the Washington County Coordinator of SOURCE.

In regards to the Paria Canyon Wilderness draft, we strongly support Alternative 2 in the draft EIS. It is our belief that the protection evolving from such a wilderness designation would involve no losses to productivity but rather promote and enhance long-term productivity due to protection management.

It is presumed in the suitability report that livestock grazing is compatible with wilderness designation. In consideration of the environmental consequences on the development and maintenance of water in the grazing allotments, we stress that the feasibility studies are carried out in full cooperation with the lease holders.

We feel that the maintenance of the existing water reservoirs and catchments can be carried out with little or



page two of 3 pages

SOUTHERN UTAH RESIDENTS CONCERNED
ABOUT THE ENVIRONMENT

Cedar City
P.O. Box 1453
84720

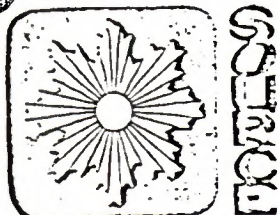
Celia Rencher-Ryan
P.O. Box 28
Pine Valley, Utah
84722

no effects on the area's wilderness values.

It is obstinate and narrow-minded to think that wilderness and grazing are not or could not be compatible. It's been going on for well over a hundred years in the west. To think that the term "designated wilderness" will change that compatibility is just more "anti-government" rhetoric.

As a result of the visitor use doubling in Paria Canyon during the past 8 years and the Navajo land application, we feel it is pertinent that Alternative 2 be adopted as a means of protecting the existing wilderness characteristics.

The land is a living entity and we can not just take, take, take year after year after year - we must also give with respect and thankfulness.



page 3 of 3 pages

SOUTHERN UTAH RESIDENTS CONCERNED
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Cedar City
P.O. Box 1453
84720

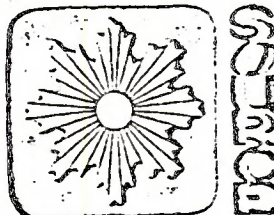
Celia Rencher-Ryan
P.O. Box 28
Pine Valley, Utah
84722

We should not pick nature's pocket, rather we should borrow and repay in the form of protecting.

The Gutter sums it all up this profound statement:

"Nature is the living, visible garment of God."

It is our duty to keep the garment pure and in good repair.



Exh. b, 2 B.

SOUTHERN UTAH RESIDENTS CONCERNED
ABOUT THE ENVIRONMENT

Cedar City
P.O. Box 1453
84720

P.O. Box 28
Pine Valley, Utah
84722

May 7, 1980

Re: E.I.S. and Suitability of the Paria, Pinta and Vermilion Cliffs

We appreciate the opportunity to provide public comment. We strongly support Alternative 2 as the most appropriate recommendation for the Secretary to make on these instant study areas.

I would like to address several popular misconceptions:

1. Vehicular Access - The areas in question, due to the rugged nature of their terrain, have received little vehicular use. Motorized vehicles have already been banned by the primitive designation of both the Pinta and Paria areas. The Vermilion Cliffs National Area permits vehicular traffic, but the use has been slight. The Paria Plateau has been used to some extent, but due to the treacherous early soil, its lack of water and the remoteness of the area, it is not ideal for motorized travel. Consequently, the designation of wilderness would have very little effect on vehicular use.

2. Grazing - Popular rhetoric supposes that wilderness designation disallows grazing. This is a false impression - grazing may and will continue in wilderness areas. Be aware that the Wilderness Act provides that grazing in designated wilderness areas shall continue. FLWMA, however, provides only that grazing may continue as one form of multiple use. It is not given any priority over other uses such as strip mining or off-road vehicle use, or even wilderness for such uses as an NM missile base or interstate highways. It is to the greatest advantage to ranchers if they honestly want to stay in the ranching business, that they strongly support wilderness designation. Wilderness is a rancher's best friend!

3. Water - The best protection for watershed is wilderness designation because it prohibits unnecessary surface disturbances. Comments which suggest wilderness would cut off the water supply of a ranch or town are completely fallacious. As evidence, Utah's only designated wilderness, appropriately called the Lonesome Peak, provides a significant part of Salt Lake City's water, and the specific authorization for its repair and maintenance, even with vehicles, is written into the authorization's designation.

4. Air Quality - Concerns that the industrial development of the surrounding area will be halted, are unfounded. Wilderness designation does not change air quality classes. The Department of the Interior can make recommendations, but the authority for air quality reclassification rests with the governors of Utah and Arizona (the affected states). By law, it is a local political decision.

5. Permeation - It is often rhetorically stated that wilderness locks out certain aspects of the public such as the young, the old, the handicapped and the pregnant. This is another false idea. Pregnant women (if they desire) are quite capable of hiking or backpacking except on very strenuous terrain. Many elderly enjoy a long and happy association with wilderness and are strong hikers and backpackers. The very young are seen not infrequently enjoying the wonders of wilderness on horseback - an easy mode for handicapped as well. Ancient horses

and backpackers will find a way to visit wilderness, and stories of 10-15 mile hikes on crutches, although unusual, are true. As taxpayers, we would object to the idea that every scenic area be made accessible by road.

6. Overuse -- It is frequently stated that wilderness designation will create overuse. The number of hikers, backpackers, photographers, horseback riders, bird watchers, canoeists, and sightseers of geologic and botanic values, are increasing rapidly. A great deal more wilderness must be set aside to disperse this use as the few existing wilderness regions are becoming heavily impacted. Some problems of visitor use to wilderness areas require thoughtful management practices to help protect natural values, and this can be done by restricting visitor use, educational pamphlets, etc. Again, the designation of more wilderness units would disperse visitor use, and such problems as vandalizing of archaeological sites and littering would not then be as severe. This is particularly important as the population of this area grows.

7. Indians -- We strongly support the prompt, fair and generous settlement of Indian claims. In regard to the areas under discussion tonight, and the Navajo application, we would like to point out that this area is not historically Navajo land, but rather Kaibab, Paiute and Anasazi.

8. The "lock-up" -- As has been previously stated, the hearing tonight is to aid the Secretary of the Interior to prepare his recommendation to the President in regard to the use and protection of these lands. The President then makes a recommendation to Congress, and Congress decides. We would like to quote the last paragraph of page 58 in the EIS draft statement.

Irreversible and Irrecoverable Commitment of Resources

The designation of lands as wilderness is a long-term commitment of resources and land. Congress, however, can change the classification. Thus, the commitment of land to wilderness would be neither irreversible nor irretrievable.

I would like to reiterate that SURE supports the Alternative 2 recommendation. We trust that the opportunity will be provided for boundary adjustment to these areas if the land contiguous to them is found to have wilderness characteristics by the current inventory.

Thank you.

Patricia Ralston
Iron County Co-ordinator
S.O.U.P.C.E.

DEPARTMENT OF INTERIOR
BUREAU OF LAND MANAGEMENT

ARIZONA STRIP WILDERNESS DRAFT

ENVIRONMENTAL IMPACT STATEMENT

and

SUITABILITY REPORT

PUBLIC HEARING

English Building - Mohave College
1971 Jagerson
Kingman, Arizona
June 3, 1980
7:30 p.m.

REPORTER'S TRANSCRIPT

OF

PROCEEDINGS

ORIGINAL

(202) 234-4433

NEAL R. GROSS
COURT REPORTERS AND TRANSCRIBERS
1330 VERMONT AVENUE NW
WASHINGTON, D.C. 20005

N. Alan Lundgren
Reporter

APPEARANCES

SOLICITOR:

Fritz L. Goreham

PANEL:

Mr. Dennis Carter
Mr. Glenn Carpenter
Mr. Kenneth Moore

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NEAL R. GROSS
COURT REPORTERS AND TRANSCRIBERS
1330 VERMONT AVENUE NW
WASHINGTON, D.C. 20005

PROCEEDINGS

THE SOLICITOR: Good evening, ladies and gentlemen. My name is Fritz L. Goreham. I'm an attorney with the Department of Interior, and my responsibility is to chair this public meeting, and the Bureau of Land Management is encouraged by the turnout for this meeting.

As you came in you were asked to fill out a registration form and identify yourself and also to indicate whether or not you wished to speak, submit a written statement, or receive a copy of the EIS, and anyone who filled those out but hasn't turned it in we'll collect them now.

A VOICE: Could we have your name again, sir?

THE SOLICITOR: My first name is Fritz, middle initial L., last name Goreham, G-o-r-e-h-a-m.

A VOICE: Would you speak loud enough for everybody to hear?

THE SOLICITOR: I will.

I have been asked to repeat my name again so people can write it down.

First name is Fritz, F-r-i-t-z, middle initial L., last name is Goreham, G-o-r-e-h-a-m.

As I said, I'm an attorney with the Office of the Solicitor, U. S. Department of the Interior, Phoenix,

1 Arizona, and my responsibility is to chair this meeting and
2 act as a moderator.

3 The meeting is twofold. The original meeting
4 which was published and notice was given out was to receive
5 public comments on the Arizona Strip Wilderness Draft
6 Environmental Impact Statement and Suitability Report. I
7 presume that all of you are familiar with what is known as
8 the Arizona Strip which is managed by the Bureau of Land
9 Management. It is in an area north of the public land which
10 is north of the Colorado River, and the administering
11 office is called the Arizona Strip District Office which is
12 located in Saint George, Utah.

13 The panel tonight involves, includes two of the
14 preparers of the draft statement which you are welcome to
15 pick up as you come in and keep. They are Glenn Carpenter
16 whose responsibility was Wilderness Scoping and Dennis
17 Carter who was the Team Leader.

18 Also included in our panel is Ken Moore who is
19 the Area Manager.

20 A VOICE: All employees of BLM?

21 THE SOLICITOR: All employees of the Bureau of
22 Land Management in Saint George, Utah.

23 I am going to jump ahead of what you read in the
24 paper or heard on the radio, that there is a second part to
25 this meeting, and that will be a discussion -- as it is

1 called in the paper an informal question and answer period
2 with Dennis Sokal. Dennis Sokal is the Recreational Planner
3 for the Shivwits Resource Area, and the discussion will
4 concern the limits on use of off-road vehicles in the
5 Shivwits Resource Area.

6 So, those people who are here for that purpose,
7 that will be following the formal public hearing dealing
8 with the Environmental Impact Statement.

9 So far I have three people who have indicated a
10 desire to speak. Now, if you checked that you didn't
11 desire to speak and you change your mind as the comments
12 are made by the various people who chose to speak, then you
13 can through me raise your hand or whatever and you will be
14 given an opportunity to speak.

15 Now, we are going to lay some ground rules. This
16 hearing is not an adversary hearing. You're entitled to
17 make your comments which will be recorded by the reporter
18 verbatim, and these will all go to the State Director.

19 Now, your comments whether it is at this meeting
20 or written comments which will have to be submitted later
21 within a later time frame which I'll explain in a minute
22 would go to the State Director in Phoenix, Arizona. I can
23 assure you that they are given consideration on any
24 recommendations, final recommendations by the BLM.

25 The subject matter of this report involves three

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1 particular areas of the Arizona Strip District. Those are
2 the Paria Canyon Primitive Area, the Paiute Primitive Area,
3 and the Vermillion Cliffs Natural Area.

4 The reason those three areas are specifically
5 identified is that the Federal Land Policy and Management
6 Act which was enacted in October of 1976 directed the
7 Secretary of the Interior to study all public land under
8 its jurisdiction for a wilderness potential and specifically
9 all areas that had been previously designated as either
10 natural or primitive areas prior to November 1, 1975.

11 They are to be reviewed and studied and
12 recommendations made prior to July 1, 1980.

13 Now, the Paria Canyon Primitive Area and the
14 Vermillion Cliffs Natural Area were designated as such in
15 January of 1969, and the Paiute Primitive Area was
16 designated as such in September of 1975.

17 So, those three areas are the areas that are
18 under consideration in this report and which will be the
19 subject of any comments that you make tonight.

20 Now, there has been an extension of the July 1st,
21 1980 deadline for which the Secretary has to make his
22 wilderness recommendations to the President as to these
23 particular areas, and this is because the Minerals Study
24 Report has not been printed and included herein. It is
25 ready to go to the printers. It is quite probable that it

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1 will be available to the public by July 1st.

2 Now, those who choose -- those who wish to make
3 written statements will have thirty days from the time that
4 report becomes available. So, once the public is made
5 aware that the Minerals Report is available, and I would
6 presume that this is correct, that it will be available at
7 all District Offices --

8 MR. CARTER: Yes.

9 THE SOLICITOR: And there will be ample notice to
10 the public, and those people who plan to send in written
11 statements, and several of you have indicated a preference
12 not to speak initially but to send in written statements,
13 that is your key. Your thirty days will run after, will
14 start to run after that notice.

15 Now, the members of the panel are here to answer
16 questions of a clarification nature. If you have any
17 questions which you wish to have clarified dealing with
18 this subject matter, then you would ask a question through
19 me and one of these people will volunteer to try to answer
20 or clarify any question that you may have as to this report.

21 Now, the ground rules will be -- right now, as
22 I said, I have three people who have chosen to speak. We
23 would like to have you limit your testimony or comments,
24 whichever, however you want to call it -- you will not be
25 under oath -- to ten minutes. If you have not finished in

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7

1 ten minutes and you feel that you need additional time, I
2 will grant you time, but if I feel -- and I won't be
3 arbitrary -- but if I feel that you're abusing the privilege,
4 I'll reserve the option to cut you off so to speak.

5 The idea of this meeting is that it be a public
6 meeting to get your comments so they can be forwarded to
7 the State Director and on to the Secretary and thus availing
8 you of all possible opportunities to make your comments,
9 and it looks like some of you are ready to make some comments.

10 So, does anybody have a question about the purpose
11 of the meeting, the first part of the meeting: nothing to
12 do with off-road use of vehicles in the Shivwits Area, and
13 it has nothing to do with any areas, anything around the
14 Kingman area at all. It is strictly the Arizona Strip
15 District.

16 A VOICE: Am I to understand that these lands
17 have been previously set aside under some other Act and are
18 not being taken under 603?

19 THE SOLICITOR: These three areas have already
20 been designated either, like in the case of the Paiute
21 Primitive Area and the Paria Primitive Area, they are
22 designated as primitive areas under a different Act.

23 The Vermillion Cliffs Area is not a primitive
24 area. It is called a natural area.

25 So, those three areas are what are identified as

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25 MR. WALTERS: First of all, I have got a slight

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3

25 MR. WALTERS: It says that hunting is to be

[illegible]

10

MS. BRUMMETT: In all fairness to the people here, I respectfully request that the gentlemen here give a review of this area. None of us have had the opportunity in all probability to evaluate this report. So, in all honesty how can you get up and give an honest projection on this if you do not have the opportunity to read it or have had the opportunity to have the gentlemen give the presentation.

Source: *Journal of the American Statistical Association*, 1990, 85, 103-113.

11

24 You can't do it, a lawyer can't do it, and, so,
25 therefore, I would like to have the three of you gentlemen

[illegible]

12

1 review what this area is up here and then let us give our
2 observations.

3 THE SOLICITOR: I believe there is some time
4 constraint problem, and I'm sure this draft took a couple
5 years at least to prepare.

6 MS. BRUMMETT: But how can we review it by
7 looking at the cover.

8 THE SOLICITOR: I recognize that, but this is the
9 reason you also have thirty days, if you choose, to submit
10 a written statement.

11 MS. BRUMMETT: But we would like to have the
12 opportunity to discuss it and be effective. This is not
13 being argumentative.

14 THE SOLICITOR: I understand that.

15 MS. BRUMMETT: But we would like to be effective
16 because we are concerned. I have been to the Strip Area --
17 I haven't been over the total area -- but it is a vast
18 unpopulated area, and when I get up to speak I will make
19 some comments to the best of my ability with what time I
20 have had to review this.

21 This is a good-looking cover.

22 THE SOLICITOR: The time situation is such that
23 the panel members just could not do that, to give comments.

24 MS. BRUMMETT: Sir?

25 THE SOLICITOR: Yes, ma'am.

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13

1 MS. BRUMMETT: In the law it states if you can
2 put in four years in putting it together then we the public
3 should have at least the opportunity to have thirty minutes
4 for a presentation.

5 THE SOLICITOR: The next speaker will be Carl
6 Jatho. I hope I have pronounced it right.

7 MR. JATHO: My name is Carl Jatho, J-a-t-h-o,
8 for the record.

9 Principally my primary concern and the reason for
10 my introductory questions was principally under which Act
11 is the land being taken.

12 It is my understanding that recently Congress
13 ruled out the termination -- the terminology of "primitive
14 area," and what has been designated previously as primitive
15 areas are now coming under consideration of Section 603 of
16 Public Law 94579.

17 If this is true then this becomes the very basis
18 of our rules in which these properties are reviewed.

19 Now, you did apologize for there not being a
20 Mineral Review with this report. However, this Mineral
21 Review in Section 603 becomes very important to each and
22 every one of us. In fact, I have a statement here from
23 several Senators here with a reference to the crucial part
24 of Section 603 that deals with the Mineral Survey made by
25 the U. S. Geological Survey, but this gentleman assures us

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SURVEYORS WHO ARE MEMBERS OF THE BUREAU OF MINES

1 that all property, that nothing will be finalized until
2 this particular basis, until such time as the U. S.
3 Geological Survey from the Bureau of Mines has made their
4 report which is as I understand mandatory under Section 603.

5 Recently I sat at a previous BLM meeting covering
6 a different area. We were confronted with the problem in
7 which there was a withdrawal of the land under Section 603
8 also and an attempt was to withdraw these under Section 204
9 of the law.

10 If you have heard me speak before in here I have
11 definitely stated my opinion with reference to 94579. I
12 have requested repeatedly over the last three years since
13 it has been written that it be withdrawn from here.

14 I have today with me a letter from Senator Dennis
15 DeConcini in which he assures me as our Senator from this
16 state that he will pursue that as long as we must abide by
17 this rule then so must BLM.

18 This is the main factor in which I myself hold an
19 interest. I am not totally mineral although basically I
20 represent mineral, but if you turn to page 61 of your
21 pamphlet there under Consultation and Coordination and
22 start down the list you will find that only on very rare
23 occasions -- I think it goes through 61 and 62 and part of
24 63 -- in which there is no mineral representation for any
25 of the entities except on page 61 where they do say they

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15

1 consulted the Bureau of Mines yet they have withdrawn the
2 Bureau of Mines' report as Section 603 does specify that
3 minerals are a crucial part of that, and as I say I have
4 a copy of a letter here from Dennis DeConcini confirming
5 this interpretation of the law.

6 Then why must we decide or attempt to decide
7 giving any further impact today to the contents which have
8 no meaning until that Mineral Survey is complete.

9 I for one enjoy areas of solitude. I do not
10 enjoy the practices that have been going forth in this
11 country for the last twenty years in which they, the BLM
12 and the Department of Interior took part in the burning of
13 a village on Potts Mountain to destroy this area of man.

14 I do not condone the BLM's policy of hiring,
15 spending \$70,000 in one area hiring Sierra Clubbers to
16 trek the area. This has been documented. I have also in
17 documentation that some of these individuals who were hired
18 have the privilege of paid ground tours of the so-called
19 wilderness areas. This in itself is a conflict with the
20 law. I do not like 94579. I will fight to my dying day
21 to have it revoked, but as long as it is the law there is
22 the question as to its Constitutionality. It has never been
23 tried before a court. I imagine the time will come and it
24 is near that it will be tried, but as long as I condone
25 that -- we have 100 Senators and 500 Representatives right

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16

1 now -- then we must try to abide by it. This is what I
2 grew up with as the way of life in this country, but the
3 people administering have to abide by it also.

4 It is in here that you cannot withdraw the land
5 under two Sections at the same time. This is why I asked
6 for clarification of the law that you were withdrawing it
7 under, and I thank you.

THE SOLICITOR: Mr. Carter will address your questions as to what seems to be a lack of mineral participation.

11 MR. CARTER: On this list of Consultation and
12 Coordination, this is an abbreviated list, and we solicited
13 consultation from other mineral groups. The list that we
14 ended with contained over 1600 groups.

15 A VOICE: We can't hear you.

16 MR. CARTER: This list on page 61, 62 and 63 is
17 an abbreviated list. There were over 1600 copies sent out,
18 and mineral interests were among those people.

19 A VOICE: Did you hear that, people?

20 A VOICE: Get over to the mike so everybody can
21 hear.

2 A VOICE: If you turn off the air conditioning
3 we could hear better.

MR. CARTER: The list on pages 61, 62 and 63 is an abbreviated list. There were over 1600 copies sent out

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UNION MEMBERS - 1960-1961

1 and mineral interests were included in those copies.

2 MR. JATHO: Were the mineral comments controversial
3 to this report?

4 MR. CARTER: We are waiting for those comments
5 now.

6 THE SOLICITOR: The next and last requested
7 speaker -- and after she finishes if anybody else desires
8 to speak, raise your hand and I'll recognize you and you
9 can come forward -- is Wilma Brummett.

10 MS. BRUMMETT: First, I'd like to thank everyone
11 that came tonight. I appreciate the fact that after having
12 been in the area that we do have this size of a turnout.
13 It does show that people do care.

14 I have not, as I told you, had the opportunity to
15 review the documentation that we received this afternoon.

16 I concur with what Carl Jatho said so I won't
17 need to repeat what he said, but I concur in it 100 percent.
18 There are a number of areas that I question. Number one,
19 I do know that we do have the Strip Area. I would like to
20 have the justification for putting it into a wilderness
21 area, this vast area, and I believe when we take the primitive
22 areas and the natural area we end up with a little over
23 93,620 acres.

Ladies and gentlemen, that is a lot of land.

It is also in the potentially, highly probable

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1 productive resource area of the overthrust belt. There is
2 a proposed or potential coal deposit up there.

3 Now, again, we are looking this all up and again
4 I request their interpretation of the road. There is no
5 legal definition of the road to my knowledge by the Federal
6 Government, and this was so stated at one of the first
7 meetings that we had by the Bureau of Land Management, and
8 I believe it was Mr. Kincaid back there who was the
9 gentleman that made the statement. You knew I would
10 recognize you.

1 We do have a State law which designates what a
2 road is in the State of Arizona. Again I do not believe
3 that this law gives the Bureau of Land Management the
4 authority to pre-empt a State law.

A great deal of the wilderness areas are based on this minimum of 5,000 acres, contiguous acres, and it could not be that if what you and I constitute as a road is correct, but when they say this is a roadless area or this is a roadless area, well, I don't know what you would call it. You say they are quarters or -- I don't know whether you use the term ingress, but they have changed the name road in the definition.

You don't review any more. You scope now. So, if you don't know what scope means; that's reviewing.

But in this area you have got the natural area.

[illegible]

1 the Vermillion Cliffs Area, and there is a major highway
2 through there, and in your areas up in the Strip Area, and
3 I know -- I don't mean to be quarreling with you gentlemen
4 but I'm challenging the law which you are going by.

5 I respect your position of having to do a job
6 that you're paid to do, and undoubtedly you're doing an
7 excellent job, but I question the discrimination within the
8 structure of that very law which I say is unconstitutional
9 for the simple reason that it's, you're being discriminated
0 against.

There are only two factors. You either have to be Daniel Boone or somebody who can ride a horse to even utilize these areas. Now, I'm not opposed to the wilderness areas per se. I probably was one of the first women delegates to the Arizona Game Protection Association. I used to teach the junior sportsmen, and I am for preservation of wildlife areas, but I cannot see how you can justify these areas if the State of Arizona or any of the eleven western states -- I know I'm digressing from the basic purpose of this meeting -- but still it gets right down to the nitty-gritty of the use of this land.

I would hope that we can have the opportunity to file a lawsuit to challenge the Federal Government and have a restraining order until such time as we can actually decide who owns this land.

본 연구는 2008년 12월 1일부터 2009년 11월 30일까지 1년간 실시된 것으로, 연구기간 동안 전국 17개 시도에서 실시된 1차년도 연구결과를 토대로 2차년도 연구결과를 도출하였다. 연구결과를 도출하기 위하여 2차년도 연구결과를 도출하기 위하여 2차년도 연구결과를 도출하였다.

1 We have no fight with the Bureau of Land Manage-
2 ment when it was a managerial position, but when the Federal
3 Government says, "Hey, man, we own it," you are going to
4 have a lot of people fight you. I don't care what this law
5 says. I challenge that."

6 Again, in this law it says very specifically that
7 there must be intensive input by all local citizens. You
8 say on page 62 that you have consulted and coordinated with
9 the Mohave County Board of Supervisors. I would like to
10 ask, number one, at what date you did that.

11 MR. CARTER: At this point this consultation has
12 come about through the preparation of this statement and
13 sending them copies for their review and their comments.

14 MS. BROMMETT: I challenge the word "consultation"
15 then, okay?

16 You also stated that you have talked to the
17 Mohave County Manager and the Mohave County Planning and
18 Zoning Commission. I know for a fact as one of your
19 gentlemen told me today that you met with the Board of
20 Supervisors. We have Mabel Bailey from the Board and Ray
21 Wells, another Supervisor, and, okay, you met with Ray Wells
22 as County Manager, but this is not what I call meeting with
23 the Board of Supervisors.

24 I do not feel that we have had proper input
25 according to this law. I will review this, and I will send

1 in reports, and hopefully the rest of you out in the
2 audience will take the time to review this, and if you do
3 not have it, ask these gentlemen for it. I'm sure they
4 will supply you with one, and the only thing that you can do
5 is to comply with this and send in your written reports.

6 I realize it is very difficult because most of
7 you have never been in the Strip Area, but again send in
8 your comments if you have ever been there or have any
9 knowledge of the area because a lot of you can sit and
10 talk, but if you do not send anything in for them to
11 evaluate then I would hope that I could be hired to go out
12 and evaluate some of this. I am not a Sierra Clubber, but
13 hopefully they'll see fit to hire me.

14 THE SOLICITOR: Thank you very much.

15 That concludes the people who initially designated
16 that they would like to speak or comment on the draft.

17 Does anybody else wish to come forward and speak?
18 (No response.)

19 THE SOLICITOR: Okay. At this time then we will
20 have a question and answer period, and hopefully the panel
21 will be able to answer your questions.

22 As I said previously, they will be questions of
23 a clarifying nature. These particular people and other
24 people listed in here just prepared the document, and I
25 think Wilma Brumett -- is that right?

1 MS. BRUMMETT: That's correct.

2 THE SOLICITOR: (continuing) really made in fact
3 a particular point which you should all keep in mind.
4 Mr. Jatho also, and I call your attention on page 5 that it
5 is Congress, not the BLM, it is Congress, your elected
6 Representatives who make the final designation of whether or
7 not a particular area becomes a wilderness area.

8 Yes, sir?

9 MR. JATRO: One question. Our elected Representa-
10 tives, we are not afraid of those guys. They say this is a
11 whole joke. They say that those guys in Kingman couldn't
12 ask intelligent questions. I agree, but I was up enough to
13 get ahold of this thing when they held the other public
14 hearing. Nobody was there that really had any solid
15 objections to the thing. You can walk into Congress and
16 how many of those eastern Congressmen are going to vote
17 against a wilderness area in Arizona that they don't even
18 know about.

19 Those of us who are going to live with it, we are
20 going to get it rammed down our throat, and yet it is
21 Congress, but those people don't care about us in Kingman.
22 It's just our land.

23 THE SOLICITOR: Well, you do recognize the fact
24 that it is still Congress, and the point I'm making is that
25 it is not the BLM. It is Congress who makes the final

1 decision.

2 A VOICE: What this man has to say is true. I go
3 back east on the average of every six months for medical
4 treatment, and when I'm back there I talk to these people
5 back to the southeast and northeast, and they think that we
6 are still putting off the Indians with bows and arrows. I'm
7 serious.

8 THE SOLICITOR: I know you are.

9 A VOICE: My parents go to Las Vegas, but not
10 here because they think there are still savages running
11 around. They will let their Congressmen and Representatives
12 vote for a wilderness area because they believe it should
13 be so. They don't know. They have never been here and
14 don't realize what it is like up in the Strip country.

5 I know for a fact, and I know people in Durango
6 and that area that have numerous mineral claims in the
7 Strip country. I have seen the others, and they have been
8 disallowed from entering those areas for over twenty years
9 by vehicles. The only way they can enter is on horseback
10 and pack animals. They tried to get out there twenty years
11 ago and were not allowed.

Mr. Jatho could give you these people's names and addresses because they don't have phone numbers because they live in the mountains.

25 THE SOLICITOR: It's still the Congressmen, the

1 Senators from the State of Arizona which have a significant
2 final impact in whether this area is designated as a
3 wilderness area.

4 MR. JATHO: Right on, but with direct reference
5 to this particular program that is in front of you, have
6 you opened it for direct questions against the material
7 involved in the pamphlet?

8 THE SOLICITOR: I wouldn't say against, Mr. Jatho.
9 You can ask questions which would clarify comments.

10 MR. JATHO: Primarily in here, this Environmental
11 Impact Study is not a multi-use report, is it?

12 THE SOLICITOR: I believe that is correct.

13 MR. JATHO: There have been no provisions for
14 studies on the right-of-way or any other specific points
15 under parts that can be interpreted under the law of
16 multi-use and principally a report for withdrawal.

17 Again I would like to ask the question: Is it
18 under Public Law 94579, Section 603 or is the withdrawal
19 under Section 204.

20 MR. CARTER: The statement here and the proposed
21 action in the alternative or the alternative that would
22 designate the wilderness area would come under Section 603.

23 MR. JATHO: Then it would be withdrawn -- if it
24 is to be withdrawn it would be withdrawn under Section 603?

25 MR. CARTER: Yes.

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1 MR. JATHO: Thank you.

2 THE SOLICITOR: Yes, ma'am?

3 MS. BRUMMETT: On the Vermillion Cliffs Natural
4 Area, would you propose to put into the wilderness area,
5 and this is in some counties over 50,000 acres of land, on
6 that 89A, that highway, it runs through that and undoubtedly
7 this is a corridor. Now, what is the status of this corridor
8 because it goes right through there. What is the area that
9 you can utilize off the side of this road before you in
10 fact consider it to be in the wilderness area?

11 MR. CARPENTER: On page 6 in the Suitability
12 Report, the --

13 THE SOLICITOR: The yellow pages.

14 MR. CARPENTER: (continuing) yellow pages, and I
15 think, perhaps, Mr. Jatho, that this may respond to some of
16 your earlier questions also, page 6 of the Suitability
17 Report. We have here two documents within the Environmental
18 Impact Statement. Part of it is the Suitability Report
19 which considers the other resources.

20 Now, specifically in response to Wilma's question,
21 Highway 89A does not go through any of the proposed area.
22 It is the southern boundary of a part of it.

23 MS. BRUMMETT: Of what?

24 MR. CARPENTER: Of a part of the proposed
25 wilderness area. I think that probably answers it.

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1 MS. BRUMMETT: Yes.

2 MR. JATHO: Is it visible from the area that is
3 designated?

4 MR. CARPENTER: It is visible, yes. The southern
5 boundary is part of it.

6 MR. JATHO: Does it not qualify under the
7 Wilderness Act on the basis of presentation of land?

8 MR. CARPENTER: Yes, it can.

9 MR. JATHO: If the highway is visible, how can
10 this qualify under the interpretation of the absence of the
11 presence of man?

12 MR. CARPENTER: The highway is not in the unit.

13 MR. JATHO: It is outside the unit yet visible
14 from it?

15 MR. CARPENTER: But it is not within the unit and
16 it is not an overriding factor relative to the naturalness
17 which, I presume, is the question you're addressing, the
18 naturalness of the unit.

19 It does not make the wilderness study area
20 unnatural to have a highway near it.

21 MR. JATHO: But the presence of man is felt within
22 that area if the highway is visible, is that not true, or
23 is that untrue or the -- let's reword it. The presence of
24 man can be seen from within the area, isn't that true?

25 MR. CARPENTER: That's true.

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1 MR. JATHO: Thank you.

2 THE SOLICITOR: Yes, ma'am.

3 A VOICE: To whom is the transcript of all this
4 hearing submitted?

5 THE SOLICITOR: To the State Director, Arizona
6 State Director.

7 A VOICE: At this Valley Bank Center address?

8 THE SOLICITOR: Yes, ma'am. This is Mr. Whitlock
9 who signed in the front.

10 MS. BRUMMETT: The last time I came to one of
11 these I had to pay \$15 for it. Is the charge still the
12 same?

13 MR. CARTER: The charge is to be determined
14 because we have a small problem of the court reporter's
15 fee, whether it applies to you getting a copy or whether
16 you can be made a copy by us, and that has to be resolved.

17 If you would leave your name at the end that you
18 wish a copy, we will resolve that and get back with you.

19 MS. BRUMMETT: Not at \$15.

20 MR. CARTER: Well, let us know.

21 MS. BAILEY: Will the Board of Supervisors get
22 this?

23 THE SOLICITOR: I don't know.

24 A VOICE: We don't.

25 MR. JATHO: Under the law you were budgeted

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1 something like \$70,000,000 to administer the program, and
2 nowhere in the law does it say you will furnish a report,
3 and nowhere does it say that you have the right to charge
4 for these reports.

5 MR. CARTER: We don't. This is the report
6 referred to there, and we are not charging for that.

7 MS. BROMMETT: We are talking about the report
8 here such as that.

9 MR. JATHO: The hearing is a part of the
10 administration of the law, is it not?

11 MR. CARTER: Right.

MR. JATBO: And there is approximately \$70,000,000 appropriated in this particular pamphlet but the retention of any funds, fifty percent of any funds that you gain from the use of the land going back into your funds, to your war chest, pardon my terminology.

17 THE SOLICITOR: Any other questions?

18 MS. BRUMMETT: If the people in the audience send
19 in reports or comments on the Strip Area, do these reports
20 go to the Phoenix office or to Saint George, Utah?

11 MR. CARTER: They go to Phoenix first and a copy
12 will go to the team in Saint George where we will answer the
13 comments that actually challenge or comment upon the
14 adequacy of the Statement, and they will be put in the back
15 in the final Statement, the responses and the comments.

1 THE SOLICITOR: Yes, Ma'am.

2 A VOICE: I don't know about this. When is it
3 going to be voted on by the Congress?

4 THE SOLICITOR: Only they know. There is no
5 limitation.

6 | A VOICE: Is it in the form of a bill right now?

7 THE SOLICITOR: It is all set out on page 6, and
8 I'll walk through it again for you.

9 A VOICE: Page 6 white or page 6 yellow?

10 THE SOLICITOR: Five white under "Purpose and
11 Need," and that is the BLM making its reporting.

12 Sometime later this year they will report to the
13 Secretary who then decides what he will do, and he makes his
14 report to the President.

15 The President then has within two years to make
16 his recommendations to Congress.

17 A VOICE: And Congress has no time limit?

18 MR. JATTO: Within the law they state they must
19 act by 1991, and from this date forward there is a six-year
20 moratorium for the withdrawal of the land. We still have
21 eleven years to go on it which if you are in my classifi-
22 cation you won't be here to use it if it is ever opened or
23 Congress decides against it.

24 However, my question delves into this primitive
25 area, the Paiute Primitive Area, the Vermillion Cliffs Area.

1 and the Paria Canyon Primitive Area on page 16 and 17 in
2 which -- I'm sorry, doesn't refer to the Paiute Primitive
3 Area which definitely states the mineral activity that is
4 known in this particular area.

How in good faith even though it may require, may retain some of the proprieties of this land, probably retain most of the proprieties that we would all find desirable in any land simply because the basic control is the watershed which gathers the minerals which feeds the animals which grows the plants which forms all the beautiful natural shives and everything else here, but my question is how in good faith where this states that the Mineral Survey must be made to make a determination and can't eliminate it, how in good faith can a highly mineralized area be recommended for wilderness status?

MR. CARTER: At the point the report becomes available and if there is conflict between what we have here and what is in it, that will be taken into consideration in the final Statement.

MR. JATHO: But the basis of this is that you speak of more conflicts. How much conflict has there been between the miners, the cattlemen, and the people about the specific areas or has there been only conflict or in a sense has it been the consensus to put it into the wilderness area or did the great rush to do that under the wilderness

1 area come to play when Congress decided to eliminate -- not
2 Congress, but the BLM decided to eliminate the word
3 primitive and natural areas?

4 MR. CARPENTER: I'm not sure that I follow your
5 question.

6 MR. JATBO: I don't think I do either. I'll
7 try again.

8 MR. CARPENTER: But let me maybe explain a little
9 of the system and that might help you understand it a little
10 better.

11 Section 603 which I'm sure you're aware of
12 requires that a Mineral Survey be made.

13 The U. S. Geological Survey and the Bureau of
14 Mines have conducted their field work, taken their samples
15 and so on, and that's the report that we are waiting for.

16 They have not provided us with a great deal of
17 advance information so we don't know what they came up with
18 either.

19 The information that is presented here in the
20 Environmental Impact Statement reflects that information
21 which is currently available, and we have a geologist who
22 prepared this particular section.

23 It talks on page 16 about localized areas with
24 some above-normal mineralization. That's as much as we
25 know about it, and there will not be a final determination

1 representative to the establishment of the wilderness area
2 without the proper evaluation of the U. S. Geological Survey
3 and the Bureau of Mines' report.

4 MR. JATHO: This is very understandable. There
5 is a conflict in here, and everyone appreciates the follow-
6 through with it.

7 However, if it known by the very powers that have
8 been granted, and you use the word "mandated" -- I still
9 use to say it is granted -- the very power that has been
10 granted to you, you select or you -- I'm not addressing
11 you as an individual but probably your boss -- but you
12 select or make the final decision in your area. It has
13 already been decided that there will be a moratorium of
14 eleven more years before this can be developed. This is
15 my conflict.

16 MR. CARPENTER: I think I understand your
17 question a little better.

18 In Section 603 is perhaps the answer to your
19 question a little bit better. This is what was determined
20 in that section as I understand the study area.

21 Actually that eleven years that you're referring
22 to refers more to other public lands which are currently
23 under wilderness review.

24 MR. JATHO: This is true, but it does have the --

25 MR. CARPENTER: So, it will be less than eleven

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1 years to reach that determination that you're interested in
2 MR. JATHO: Congress has until that time to act
3 on it, and you can get your report in on a timely basis and
4 Congress still has until that time to act on it.

5 I understand that, and I am very appreciative that
6 you cannot tell Congress when to act. You can merely
7 furnish the information, but the prerogative of withdrawal
8 is the area that is generated to Congress in the next eleven
9 years, and this land has the potential of being withdrawn
10 from public use other than to a limited few. I resent very
11 bitterly the fact that I have documented it and it goes
12 through your area, part of it does in which trips, people
13 charge for trips, and I assume that the Government gets a
14 kickback on these people charging everybody to go down the
15 river or hike through these mountains on these guided tours
16 through these mountains.

17 Now, where does this money go?

18 MR. CARPENTER: We have nothing in the Paiute
19 Primitive Area, and whenever we have received --

20 MR. JATHO: I don't doubt that.

21 MR. CARPENTER: I'm trying to keep it to the
22 context of what we're discussing here tonight.

23 MR. JATHO: I understand that, but the generali-
24 zation covering the text of what you want to call these areas,
25 I have reviewed this book, and there are many beautiful

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1 things in here that I would like to see many people see in
2 the future, but I am a little selfish in one area. I am
3 more concerned how it affects my lifetime than I am with
4 how it affects someone a hundred years from now. A hundred
5 years ago -- not even a hundred years ago, thirty years
6 ago, forty years ago, they told us within two years we will
7 be out of timber, and we as people put together this thing
8 and now we have more lumber than we have ever had in our
9 life yet this was the economic initiative that did it. This
10 is the same thing.

11 We may be short, we may be threatened and
12 endangering species, we may have animals that are disappearing,
13 but we as individuals, and this is the law, cannot stop
14 this from happening. It has been happening since time has
15 been recorded. Species have become extinct. Certain
16 elements in the form that we use them become used up, but
17 always man has reverted back and developed new things for
18 it.

19 I appreciate the area. I love the area. This is
20 where I can walk and sit and look, and I have been able to
21 do it now for -- I have been living in the west since 1944
22 when I was discharged from the Marine Corps, and I have
23 lived in the west and spent many hours in these areas, these
24 very areas that you're discussing, and in all that time
25 there has never been any conflict with anybody.

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1 Now, all of a sudden you want them under a specific
2 law for a specific designation and you are even now changing
3 the designation that went forth nine, ten years ago.

4 Now then this is where the conflict comes.

5 MR. CARPENTER: Mr. Jatho, if I might respond to
6 this and try to put it a little bit in context.

7 The Paiute Primitive Area that you're talking
8 about with this conflict, there was some interest in the
9 mineralization in there, and in this report we mention
10 that at least one of those areas be eliminated from further
11 consideration.

12 In terms of other conflicts, so far in the
13 hearings there has been nothing brought to our attention
14 that there is any conflict where the minerals are concerned,
15 and in terms of changing or withdrawing, et cetera, I think,
16 perhaps, the best description of what we're doing is that
17 we are responding to the law that Congress passed, the
18 Federal Land Policy and Land Management Act, Section 603,
19 in reviewing that land relative to the direction they gave
20 us.

21 It is not withdrawal per se that we are going
22 through. We are going through the review according to these
23 directions.

24 MR. JATHO: Do you understand that -- I commend
25 all the members of the ELM, but I still argue with them and

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1 fight like cats and dogs with them and hold nothing personal
2 against any individual. I command you for the job you are
3 doing, but apparently from the concept of your boss you're
4 doing an excellent job or you wouldn't be holding the job,
5 but the fact is that I disagree with your concept of what
6 you're doing. I happen to disagree with your interpretation
7 of what you're doing.

8 So, I have taken it upon myself, and I have been
9 assured that as long as this 94579 remains the law I will
10 have to comply with it, but I have been assured now that
11 you will comply with it, and I will become a watchdog to
12 see that you do.

13 MR. CARPENTER: Thank you.

14 THE SOLICITOR: Yes, ma'am.

15 A VOICE: I don't know anything about 94579. I
16 don't know anything about numbers. I just want to know who
17 Paria Canyon and Paiute and Vermillion Cliffs belongs to?

18 THE SOLICITOR: They are public lands. They are
19 owned by the public.

20 A VOICE: By us? And what you're trying to do is
21 that the Government is taking them over?

22 THE SOLICITOR: That is a bad word. That was
23 Mr. Jatho's word.

24 MR. JATHO: Confiscated is mine.

25 THE SOLICITOR: They are public lands under the

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1 management of Congress, and Congress has given that manage-
2 ment authority to the Bureau of Land Management.

3 A VOICE: And you're going to make natural
4 resources public land, portions out of them? What are you
5 going to do?

6 THE SOLICITOR: It is the proposal that they are,
7 can go wilderness.

8 A VOICE: That means that everybody can go there
9 except backpackers?

10 THE SOLICITOR: That's all right in there.

11 MS. BRUMMETT: On page 1 or it's the second page
12 actually where it describes the Arizona Strip Wilderness,
13 and then under number 2 where it says "Abstract" about
14 three-quarters of the way down this one, I'd like to read
15 one sentence and, of course, I know -- I don't like to take
16 one sentence out of context because it can completely change
17 the meaning -- but it says "Wilderness designation would
18 increase visitor use and further protect wilderness values
19 while restricting mineral development . . ."

20 Would you please clarify that for me. How can you
21 take and have a wilderness area and say that you're going to
22 have an increase in visitors and it is going to further
23 protect wilderness values. It's doubletalk to me.

24 MR. CARTER: In terms of visitor use, our premise
25 is that by making them wilderness areas and by making it

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1 public knowledge and that is, you know, newspaper articles
2 or whatever comes about, there probably is going to be more
3 notoriety and therefore more people coming and visiting the
4 area. That is our premise.

5 The second thing is that to protect the wilderness
6 area we are restricting mineral development and regulating
7 wildlife development. This is just to protect the wilderness
8 values that exist there.

9 MS. BRUMMETT: Your analogy is not valid.
10 Number one, because if you, as you have said in your law and
11 as you have in your documentation, the wilderness designation
12 closes it to anyone other than someone who can walk or hike
13 into that area or ride a horse.

14 Now, that restricts the amount of people who can
15 utilize this area.

16 So, how can you say that you're going to have a
17 greater impact?

18 MR. CARTER: In terms of the areas we are discussing
19 right here, there is no ORVs or off-road vehicles utilized
20 in the areas now.

21 MS. BRUMMETT: That's correct, but how can you say
22 that if you lock it up where only these two areas can use
23 it, in other words, the people that are capable of hiking
24 in there or someone who can ride a horse, and now you're
25 restricting the use of old persons so I can't use it, how

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1 can you justify that it is going to increase visitor use
2 unless you invite all the Sierra Clubbers up there.

3 MR. CARTER: What we are saying at the present
4 is that the visitor use does consist of backpackers, hikers,
5 et cetera.

6 MS. BRUMMETT: That's correct.

7 MR. CARTER: And by designating the area it will
8 become well-known and there will be more backpackers and
9 hikers, et cetera, coming into the area and utilizing the
10 area.

11 That is our assumption as a team.

12 THE SOLICITOR: I think that has been borne out
13 by -- I was involved when this primitive area of Paria
14 Canyon was declared a primitive area in 1969, and I'm sure
15 that since it became a primitive area more people have gone
16 there because of that designation.

17 I know this is true of Aravaipa down by Klondyke
18 because people didn't know it was there until it was
19 designated.

20 MR. JATHO: Do I understand they intend to charge
21 them for entry?

22 THE SOLICITOR: No.

23 Yes, ma'am.

24 A VOICE: According to the Draft, according to
25 what this gentleman said, there have been geological surveys

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1 done in the area and they have taken mineral samples, and I
2 sure hope and pray to God that the geologists they had there
3 know more than the ones we had in Kingman that came up to my
4 house and asked me where the mineral area ended and the
5 demineralized area began.

6 THE SOLICITOR: Anybody else?

7 Yes, ma'am.

8 A VOICE: I'd like to know how you, how this
9 information that you gathered from the public, and I assume
10 that everybody here was under the assumption that the area
11 that was going to be discussed was around Kingman, and the
12 Strip Area, I don't know if there is enough people familiar
13 with it, but I wonder when you are going to get input from
14 the public which is by law you have to do this and gather
15 their opinions, do it in the areas where the people are
16 familiar with the area that you're talking about, or do you
17 go some place other than that so everybody gets disgusted
18 and then they don't attend meetings and therefore the
19 Government goes on and does what it wants to do?

20 THE SOLICITOR: There has already been four
21 meetings held, one in Salt Lake City, one in Saint George,
22 one in Kanab, and one in Phoenix, and it was decided since
23 information requests were made that this meeting tonight in
24 Kingman and the one tomorrow night in Flagstaff -- maybe
25 Mr. Jatho will be in Flagstaff --

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1 A VOICE: No, a friend of ours will be.

2 THE SOLICITOR: So, there has already been four
3 meetings that you could say more directly concerned these
4 three areas, but there was sufficient information sought and
5 commented on either by phone or letter to the BLM that it
6 was decided to have these two meetings, and that's the
7 reason we are here tonight.

8 In other words, whether you were here initially
9 or not, when they start this work on the intensive study of
10 the area around Kingman, there will be public meetings on
11 this here in Kingman.

12 A VOICE: I see. Another thing I would like to
13 comment on, I think the meeting to me is a little bit void
14 because the public really cannot put a whole bunch of input
15 on the whole thing, a whole bunch of information that they
16 don't really have clear in their minds, but, you know,
17 because the people that are involved with land management,
18 they know their job and business and the general public does
19 not. Therefore, if the input that the public puts into a
20 meeting is going to, what, Congress or the head honcho who
21 is making the decision on this, it is going to come out kind
22 of shoddy because the people are not aware totally of what
23 is going on and what is involved and what it entails, and
24 that's all I have to say.

25 THE SOLICITOR: I'd say Mr. Jatho probably might

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1 understand it at least as well as anybody else.

2 Yes, ma'am.

3 A VOICE: Mr. Goreham, if this is going to be
4 voted on by Congress and the Senate, right, well then, we,
5 it's not really up to us because there are so many other
6 states.

7 MS. BRUMMETT: I beg your pardon.

8 THE SOLICITOR: I wouldn't operate under that
9 assumption at all.

10 A VOICE: But Arizona Senators, we only have
11 three or four.

12 All right, five, but five guys couldn't do every-
13 thing.

14 THE SOLICITOR: I don't want to get into a
15 political science debate, but they can.

16 MR. WALTERS: How soon is the same thing planned
17 for the immediate Kingman area? This is my understanding
18 of what I thought this was.

19 THE SOLICITOR: I'll refer you to Bill Carter
20 from the Arizona State Office.

21 MR. BILL CARTER: The latter part of June we
22 intend to begin in this area before anything is recommended.

23 THE SOLICITOR: They can't hear you at all because
24 of the fan.

25 MR. KINCAID: There has been a little confusion

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1 obviously about discussions on proposals for further
2 wilderness studies within the Kingman area as opposed to
3 these areas already designated as primitive and natural
4 areas in the Strip.

5 The entire State of Arizona will be presented to
6 the public for review on what areas in the state ought to
7 be studied further, and the comment period began on that on
8 May 30th, and if any of you feel that you did not have
9 adequate information in your hands tonight preparatory to this
10 meeting here for this area as proposed then it is probably
11 because you were not on our mailing list and did not get
12 the information early.

13 If you are not on our mailing list then you have
14 not gotten the information on our proposals for the
15 remainder of the state, and, therefore, I suggest that on
16 your way out of here tonight if you are not on the mailing
17 list that you give us your name and address or get a card
18 there from Carl Jatho who has a few left over. We passed
19 out about 6,000 to residents of the State of Arizona.

20 You will then be on the mailing list and we will
21 mail to you immediately a 200-page document and a map of
22 the state which Carl also has in his possession and has
23 received because he is on the mailing list, and that will
24 give you the information that you're probably looking for
25 about the Kingman area.

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1 Then, we will have an open-house here in Kingman
2 on that report on June 25th, three weeks from today.
3 There will be other open-houses around the state,
4 Lake Havasu City, Page, Flagstaff and Wickenburg as it
5 concerns the Mohave area, and then you will have an
6 opportunity to attend those open-houses, and if you get your
7 name on the mailing list and get this report you will have
8 adequate time to respond to some of the other wilderness
9 input that is being solicited from you.

10 A VOICE: I want to -- I have spoken or asked a
11 number of people as they were coming in the door and they
12 said they had not seen the literature. Carl received his
13 literature about three, four weeks ago as did his sister
14 and brother-in-law receive theirs about two weeks ago
15 because they go to two different Post Office box numbers,
16 but the majority of the people here if they will raise their
17 hands would tell you that they did not receive anything in
18 the mail and they are on the mailing list.

19 MR. KINCAID: All I can tell you is that when we
20 first established the mailing list we asked every individual
21 to respond to -- and you can see it on that little card that
22 Carl has -- which districts in the State of Arizona they
23 were interested in.

24 The majority of the people only indicated the
25 Phoenix District.

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1 Because the study area that is being reviewed
2 here tonight is in the Strip District, if you did not put
3 down that area, the Strip District on that card, you would
4 not have been on the Arizona Strip District mailing list
5 and would not have gotten the information.

6 Now, that is unfortunate, but that is what may
7 have happened.

8 MR. JATBO: If you're on this list about every
9 month they will send out a slip and if you don't sign your
10 name to the bottom and fill it out -- you don't have to pay
11 postage -- if you don't sign your name to the bottom and
12 check you want to continue to get them they will eliminate
13 your name. They are trying to cut down on the mailing list.
14 I guess, but you must send this report back or you won't
15 get it in the future.

16 MR. KINCAID: When you receive those mail-outs
17 they ask you whether you want to receive the following
18 reports, and then also it says at the bottom if you are
19 no longer interested to please indicate here.

20 THE SOLICITOR: Okay.

21 MS. BRUMMETT: I have one more question. The
22 open-house meetings are normally held from 9:00 to 8:00.
23 We have consistently requested night meetings such as this,
24 and I would like to ask everyone in this room who is opposed
25 to the open-house program or those who would prefer a night

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1 meeting, an open debate meeting to raise their hands.

2 Those who want a night meeting instead of this
3 one-to-one ratio because everyone I have talked to and we
4 have respectfully requested that we do not want the open-
5 houses. The last time we had an open-house --

6 A VOICE: I favor the same method they are using
7 now.

8 MS. BRUMMETT: You mean like tonight?

9 A VOICE: No, what they have planned.

10 MS. BRUMMETT: That's one for the other side.

11 So, we do respectfully request because we do not
12 feel, I do not feel and I feel there are many others that
13 it affects on a one-to-one open-house basis that we would
14 like to have you make arrangements for that meeting -- I'm
15 sure you have already made the arrangements for the
16 fairgrounds, but we would like to have a night meeting, and
17 if you want me to send in confirmation of that by numbers
18 of people, I will do that, but we do not -- everyone I have
19 talked to, and I have attended every one of these meetings --
20 do not like the open-house format.

21 Now, can we get a night meeting here for all the
22 other meetings in the Kingman area?

23 THE SOLICITOR: That is something for you to take
24 up with Mr. Taylor.

25 MS. BRUMMETT: Roger, he's the one that makes the

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1 decision?

2 MR. KINCAID: If you are not on that mailing
3 list, and apparently you are not, give us your name and
4 address so we can send you this information and have the
5 open-house in three weeks and you will be prepared.

6 THE SOLICITOR: Anything else on the Strip
7 question before we go to the off-road vehicle use?

8 A VOICE: I would have one point and that is
9 that the BLM has been very good in releasing the information.
10 I have had this report for a good many weeks and in that
11 time I studied it and at the time I had specific comments
12 regarding specific conclusions in the report.

13 My quarrel, I think, is that somehow in this area
14 we are being failed to be informed of the specific purpose
15 of the meetings. I have known for several weeks so at least
16 better than a week that there was some meeting being held
17 by the BLM at this location tonight, and I have tried to find
18 out specifically what it is, and I never knew until I walked
19 into the room this evening and learned that it was specifi-
20 cally on this Environmental Statement. If I had known I
21 would have had specific comments on the Statement. As it is
22 I will send them in in writing.

23 THE SOLICITOR: Thank you.

24 A VOICE: What we need is better information on
25 the meetings and the purpose of the meetings so we can be

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1 prepared when the meeting time comes.

2 THE SOLICITOR: Thank you very much.

3 MR. JAYHO: The information has been circulated

4 around the area for this week.

5 THE SOLICITOR: Anything further? Mrs. Bailey.

6 MS. BAILEY: I didn't know anything about any

7 meeting until Wilma called me and told me there was to be

8 three meetings outside of the Kingman area and nothing in

9 Mohave; one in Saint George and one in Phoenix and one in

10 Kanab.

11 That's when my office called the BLM in Phoenix

12 or, I guess, it was Mr. Taylor they contacted and got a

13 meeting down here, and that was just on last-minute notice.

14 THE SOLICITOR: The BLM will take this all into

15 consideration in future meetings on any subject because the

16 people are supposed to be involved and we want them involved.

17 and we'll take that up with the Public Affairs Officer who

18 is responsible for that.

19 MS. BRUMMETT: We had it put on the air every

20 morning and KAAA was super. I called and asked them, and

21 I see no reason why Roger couldn't do so. Therefore we

22 could get coverage from the beginning so we know about it,

23 but it was because of us going in and doing this instead

24 of the Bureau of Land Management.

25 THE SOLICITOR: Anything else?

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1 THE SOLICITOR: I'll refer you back to Mr. Kincaid.

2 MR. KINCAID: It will begin at 9:00 in the morning

3 until 8:00 in the evening, and it is being held at the

4 Mohave County Fairgrounds where we had it in the past. We

5 will have on display there a map of the immediate Kingman

6 area showing which areas we feel will be studied further

7 and which areas will not have wilderness characteristics

8 and can now be dropped from further consideration.

9 THE SOLICITOR: Okay. If that is all there is

10 concerning these three areas I will then ask Mr. Sokal who

11 is the Recreation Planner of the Arizona Strip District for

12 the Shivwits Resource Area to talk and field questions as

13 to off-road vehicle use.

14 I thank you.

15 (Whereupon, at this time the reported portion of

16 the public hearing was concluded.)

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1 A VOICE: You're an attorney? Who do you

2 represent?

3 THE SOLICITOR: I represent the Secretary of

4 the Interior. There are a lot of agencies, ma'am.

5 A VOICE: How can we say that we need to get

6 independence from the oil-exporting countries but yet you

7 want to take this million acres and lock it up where we

8 can't go in and seek out the mineralization and the possible

9 oil that is there to make us independent from Iran who we

10 need to do because we don't need another Iran to open our

11 eyes to the situation we have here. Somebody has got to

12 make a living off of the land whether we make it by washing

13 each other's laundry or selling each other automobiles.

14 Somebody has to produce from the land to make it. Somebody

15 has to make a living off of the land, and we can't by

16 locking it up so that a minority can go in and take

17 advantage of it.

18 All these people that have worked all their

19 productive life, pay taxes and everything else, now we are

20 denying them the privilege of access to this area because

21 they can't go in on horseback and they can't take their Jeep

22 in.

23 THE SOLICITOR: Mr. Walters?

24 MR. WALTERS: I need a little clarification on

25 that open-house. How will that work? Is it during the day?

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STATE OF ARIZONA)
COUNTY OF MARICOPA) ss.

I HEREBY CERTIFY that the proceedings had upon
the foregoing public hearing are contained in the shorthand
record made by me thereof, and that the foregoing 51 pages
constitute a full, true, and accurate transcript of said
shorthand record of all proceedings had upon the taking of
said public hearing, all done to the best of my skill and
ability.

WITNESS my hand and seal of office this 6th day
of June, 1980.

N. Alan Lundgren
N. Alan Lundgren
Notary Public

My commission expires:
September 5, 1983

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PUBLIC HEARING

DEPARTMENT OF INTERIOR
BUREAU OF LAND MANAGEMENT

RE: ARIZONA STRIP WILDERNESS
DRAFT

ENVIRONMENTAL IMPACT STATEMENT AND SUITABILITY REPORT

Evergreen Motel
1010 East Santa Fe
Flagstaff, Arizona
June 4, 1980
7:30 p.m.

REPORTER'S TRANSCRIPT OF
PROCEEDINGS

ORIGINAL
1707 234-4433

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Madeleine A. Cestle
Reporter

APPEARANCES

Fritz Gorham, Solicitor
Dennis Carter, Team Leader
Glen Carpenter, Wilderness Coordinator for Arizona
Ferron Levitt, Area Manager
Larry Royer, Wilderness Coordinator for Utah

PROCEEDINGS

MR. GORHAM: It is 7:42. We will start now.
My name is Fritz Gorham. I am an attorney with the
Department of Interior.

My function tonight is to chair and moderate
this public meeting.

This meeting is not an adversary proceeding,
but it is a public meeting in which you the public are
invited to make comments, statements, which will be
recorded by the court reporter here, on the subject
tonight which is the Environmental Impact Statement and

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1 Suitability Report of the Arizona Strip Wilderness Draft,
2 and it deals with three specific areas, namely, the Paria
3 Canyon Primitive Area, the Paiute Primitive Area, and the
4 Vermillion Cliffs Natural Area. All of these are in what
5 is known as the Arizona Strip District. That's identifica-
6 tion by the Bureau of Land Management, and they are
7 serviced primarily out of the Arizona Strip District Office
8 in St. George, Utah.

9 When Congress passed what the Bureau of Land
10 Management refers to as the Organic Act, known as the
11 Federal Land Policy and Management Act, passed October 22,
12 1976, in Section 603(a) of that Act provides that the
13 BLM will review wilderness potential of natural and
14 primitive areas designated before 1975. These were
15 identified as instant -- wilderness instant study areas.
16 If you are not familiar -- all of this stuff is in this
17 book that you picked up when you came in.

18 The Paria Canyon and the Vermillion Cliffs
19 Primitive and Natural Areas respectively were designated
20 as such in January 1969, and the Paiute Primitive Area
21 was designated in September of 1975.

22 So all three of these areas come within that
23 mandate, and that's the purpose of this book.

24 Now, tonight we have a panel which will field
25 clarification questions, and they are Dennis Carter. He

1 is the Team Leader. He's stationed in St. George, Utah.
2 Glen Carpenter of Wilderness and Scoping in St. George,
3 Utah. Ferron Levitt, who is the Area Manager of the
4 Vermillion Resource Area, and Larry Royer, Wilderness
5 Coordinator for the Cedar City Cedar District in Utah.

6 For your information there have been previous
7 meetings on this held in Salt Lake City, St. George, Kanab,
8 Utah, Phoenix, Arizona, and last night we were in Kingman,
9 and this will be the final meeting, I believe.

10 Now, the purpose of the meeting, as I said, is
11 for you to make comments if you want to go on record which
12 will go to the State Director, Mr. Clair Whitlock. Now,
13 if you choose not speak tonight, you can submit written
14 statements to Mr. Whitlock.

15 Now, by law this recommendation by the Secretary
16 to the President was supposed to be in July 1st, 1980,
17 upon which the President then can make his recommendation
18 within two years to Congress, and then Congress is the one
19 that makes the final designation as to whether or not
20 areas become wilderness designated.

21 Because of a delay in the mineral study by the
22 USGS and the Bureau of Mines, we have got an extension on
23 that July 1st deadline, and it's anticipated that this
24 report will be out and made public by July 1st, and so you
25 will have 30 days from that date in which to get your

1 comments in.

2 There is some reference to minerals in here,
3 but it is not the complete study as done by the two
4 agencies I mentioned, the U. S. Geological Survey and the
5 Bureau of Mines. The mention in here was that put in by
6 a representative of BLM, and it's very general as to
7 potential mineral values in these areas.

8 Now, I have so far three people who have
9 requested the opportunity to speak. Just because you
10 didn't request initially the opportunity to speak, after
11 these three people are finished, if any of you choose to
12 speak, of course, you can do so. We do not have a micro-
13 phone. I think the room is small enough that you can
14 stand.

15 Do you think you will be able to hear if they
16 stand where they are?

17 THE COURT REPORTER: We can try it.

18 MR. GORHAM: All right. Just identify yourself
19 so the court reporter can get your name down. We would
20 like to limit you to ten minutes. If you need more time
21 and in my opinion is relevant, you can have more time.
22 But I reserve the right to terminate you or cut you off,
23 so to speak, if I think you are rambling on. I really
24 don't think we'll have that problem.

25 And, as I said, once these three people finish,

1 the panel here hopefully can field your questions of a
2 clarification nature.

3 There is a second portion of the meeting which
4 I don't know how much publication it got, but Dan Sokal
5 will be here after this meeting has concluded, this
6 portion of the meeting, to discuss the off-road vehicle
7 use in the Shuwitz Resource Area, but that will be after
8 this meeting, and that will be just an informal question-
9 and-answer period.

10 Okay, we'll start with Dawson Henderson. You
11 want to come up here, or you can stand there. It doesn't
12 matter. Maybe you better come up here.

13 MR. HENDERSON: Tonight I am representing a
14 group from Flagstaff, and actually we have members in Utah
15 as well and the pre-resource council, and I would like to
16 first submit this weighty document which was our descrip-
17 tion of the area in our proposal for Paria Canyon Wilder-
18 ness. I would like to submit that to the public record.

19 I am also representing or I represent also the
20 Sierra Club. I'm the wilderness coordinator for the
21 Arizona Strip. I have been trying to stay involved with
22 the BLM issues.

23 I have to say this, I finally have a meeting
24 here where I can actually say I am a resident. I am a
25 resident of Flagstaff for one and a half years. I moved

1 out from the Bay Area to get away from the rat race and
2 get out where I can enjoy these lovely canyon lands.

3 Specifically tonight I want to discuss a
4 couple of items.

5 First of all, on Page 53 of the document DIS
6 there was a disturbing paragraph which ended in these
7 words having to do with wilderness: "Designating only
8 part of the contiguous lands, however, would preclude the
9 future option of protecting any remaining lands determined
10 through complete inventory to have wilderness character."

11 When I read this, it seemed to imply that some
12 release language had been written into the document, and
13 I was unhappy to read that. I felt that whether or not
14 contiguous lands were discussed or not in this document
15 was good or bad pertaining, you know, to the results from
16 my point of view.

17 I feel we cannot neglect the wilderness process
18 that is going on right now. If there are contiguous lands
19 which have wilderness potential, I don't think we should
20 be in a hurry to dismiss them. We should go through the
21 regular wilderness process that we are going through.

22 The lands in Arizona, the contiguous lands,
23 have all been proposed through wilderness study area
24 status. I would hate to see that acreage of land or that
25 size of land be reduced without the full study being made.

1 I think let's go on to this wilderness study
2 process however many years it is going to take. Then
3 let's come up with the boundaries. Let's not be in such
4 a hurry.

5 On that negative note I would like to at least
6 say a few positive things. I am happy the document came
7 out at an appropriate time so we can get out and see this
8 area. You generated a lot of public support and a lot of
9 public interest, and even though it's hot out there, it
10 is not the wintertime, we can drive our cars out there and
11 get out and walk around.

12 I am glad that you emphasized the fact that
13 hunting is allowed in a wilderness area. So many people
14 on the street in Flagstaff think that for some reason if
15 you have wilderness, you can't do anything on there but
16 walk around. I am glad that you emphasized the fact that
17 grazing is a compatible, multiple use with wilderness.
18 Grazing is allowed in wilderness. What isn't allowed in
19 the wilderness? It is uncontrolled motorized access.

20 But while I am talking about grazing, I was
21 very disconcerted that grazing had such a minor, you know,
22 such a minor part in this Environmental Impact Statement
23 on the impacts of wilderness for the Vermillion Cliffs.
24 There is one paragraph written on grazing, and it seems
25 to me that more than one paragraph could be -- I think

So perhaps part of our concern has been taken care of.

We have felt that the Vermillion Cliffs and the Paria Canyon Area, the Paria Plateau, have had very significant value for wilderness area, not just because of the pristine quality of the environment, we are talking landwise the structures, canyons, et cetera, but also because of the significance of both habitat and wildlife and lack of habitat and wildlife.

To clarify we are talking about certain species of plants, animals that are now endangered and that -- such as the Peregrine falcon which are no longer with us in this area. It is hoped that by protecting these areas to wilderness or natural status would indeed make it possible for some of the more unique forms of wildlife to be able to reoccur and to re-establish their boundaries and so forth to the area.

We have also had great concern with the, in the area, the quality of the land, the quality of the resource both in habitat and wildlife. This is our primary aim. We are not basically concerned with a lot of the other aspects. Primarily, I shouldn't say we are not concerned. We place more emphasis, of course, as a conservation club a lot many times on habitat and wildlife and those resources associated with them. We feel

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the habitat that is there needs to be protected. A very fragile ecological system which even though it has been taken care of could easily be abused through the increased use of all forms of recreation.

To place us into a wilderness status would indeed, I feel, rather than increase visitor use possibly would decrease visitor use, and this decrease would therefore tend to protect the fragile environment.

We realize that this is, of course, going to place certain handicaps on those who make their livelihood in the Vermillion Cliffs, Paria Plateau Area. The ranchers, those who have homesteaded that area and ranched that area for generations. However, we do understand that much of this is done, you might say, in an historical sense. This would be a horse factor, and possibly any deprivation their actions would place upon the land would have been minimal and would be minimal under wilderness classification.

We appreciate the fact that this EIS does state under certain conditions and within certain boundaries and guidelines that the enhancement of the environment will be allowed to continue, and this we are talking about the maintenance and the building of water easements and in some areas possibly reseeding of certain grasses. We hope that this will indeed continue because it benefits

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not only livestock but also wildlife, and this in turn benefits us all esthetically. Also it benefits us all in consumptive as well as non-consumptive uses and tangible as well as intangible benefits recreationwise.

We also would hesitate to see that this area would be open to exploration, heavy exploration, for minerals or development for minerals to be used such as in power production. Not that we have anything against electrical power or our need to use oil or other minerals for our national security, but we feel that these minerals rather than to be exploited at this time would be best left alone unless they are really needed for national crisis.

We realize this may place some concern upon those residents living in the surrounding area who are afraid for their jobs and so forth, but the fact that they haven't had these jobs to begin with all these years, possibly might help to mitigate that certain aspect.

I would like to read then just briefly a position statement from Coconino Sportsman which we will also include written documentation to Mr. Whitlock within the time frame, especially since we understand this other study on minerals is coming out. It goes on to speak, of course, we wish to supply input data and comments into this report, and as I have spoken just directly about

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Paria Canyon and Vermillion Cliffs, this is an area we ourselves are most familiar with, we have no objection necessarily to the Paiute Wilderness Area except to emphasize that the need for continued wildlife reintroduction and habitats, improvements and enhancement must needs continue, and that the work done by agencies establishing habitat, establishing wildlife species such as the Big Horn species that this be left to be able to continue by whatever means is deemed reasonably necessary to increase and enhance the wildlife values of the Paiute Wilderness Area.

We believe that in the proposed Paiute-Paria Wilderness Area some lands are described as marginal for wilderness values; therefore, some adverse impact socially and economically may result from inclusion of such marginal lands. Due to such impacts, we do not advocate Alternative 2. Even though some preserves exist to include as much land as possible into the wilderness classification, we feel that many acres under this proposal do not truly meet the unique, scenic and/or historical classification needed for inclusion.

Due also to existing roadways, mining, livestock improvements, the total Vermillion Cliff Areas may not be suitable for wilderness classification. We stress the word "may." We hesitate to exclude this area from

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1 such classification except with the proviso that at such
2 time such action is deemed necessary for endangered wild-
3 life species and for the protection of the Mormon,
4 Honeymoon and Dominguez-Escalante Trails, then the
5 Vermillion Cliffs Area not included in the proposed
6 wilderness should be removed from natural status and
7 included in the Paria Wilderness. We urge this area
8 continue to be managed in such a way contingent upon
9 around use, and existing water rights, impoundments, and
10 water improvements be allowed to continue. To do so both
11 benefits wildlife and livestock.

12 We, therefore, recommend at this time that the
13 BLM urge Congress to accept Alternative 1 of this EIS
14 proposal. This recommendation should also include the
15 continuance of proper livestock grazing management,
16 associated developments and wildlife habitat improvement
17 as long as these systems remain compatible with conserva-
18 tion measures and practices, and also that all those uses
19 deemed compatible as listed in Page 8, Suitability
20 Recommendation, be instituted and maintained and
21 encouraged.

22 In the case of economical and recoverable oil
23 deposits located -- mineral or oil deposits are located
24 and such esteemed vital to the national interest, the
25 lands included in the wilderness area holding such deposits

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1 then be subject to classification change.

2 We request further study reports and environ-
3 mental impact statements for public review on those issues.
4 Public input should be accepted before any classification
5 changes are implemented.

6 We also recommend that any public land not
7 included in the wilderness area as proposed, in other
8 words, talking about not being for sale or trade, are not
9 therefore included into any Indian Reservation lands.

10 Now, we have put this in there even though
11 with the understanding the Indian problem has possibly
12 been settled, but we do not wish to see the Indian nations
13 take this very fragile ecological system into the
14 Reservation. I will not go into that farther. I think
15 if you drive from Tuba City to Keams Canyon, you will
16 understand well enough.

17 At this time this concludes our presentation.

18 MR. GORHAM: Thank you, Mr. Peterson.

19 Most of you are probably aware, but for those
20 of you who are not, with reference to the House Rock Valley
21 and the Navajo Tribe, the Navajo Tribe has had pending for
22 several years now before the Secretary an application to
23 purchase the 250,000 acres in House Rock Valley pursuant
24 to the Navajo-Hopi Relocation Act.

25 But every indication -- our office has not

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1 received a copy of the bill although my boss is actively
2 involved. Every indication from the newspapers are,
3 based on committee action, that that is going to be
4 hammered out and that the Navajo -- there will be no
5 purchase or acquisition of land north of the Colorado
6 River, so that eliminates House Rock Valley.

7 They are going to possibly go south or maybe
8 into New Mexico. We have every indication that House
9 Rock Valley is no longer a viable alternative to the
10 Navajo Tribe, which obviously materially affects these
11 two areas, certainly the Vermillion Cliffs Area.

12 Our last designated requested speaker is W.
13 Beaver.

14 MR. BEAVER: I submit a copy here.

15 MR. GORHAM: Thank you.

16 MR. BEAVER: Well, I think I am going to
17 comment on this from a totally different angle.

18 In this draft statement there is a very crucial
19 statement I would like to quote to begin with. "Once
20 visitor-carrying capacities are reached in the proposed
21 Paria Canyon-Paiute Wilderness Areas, naturalness and the
22 opportunity for solitude would diminish."

23 This statement infers that if the two areas
24 were not made into a wilderness, then some magical process
25 would occur in which there would be an increase in

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1 visitors to the area. But you don't exactly explain how
2 that comes about.

3 Incidentally, I am glad you guys are here. I
4 brought up this slanted statement because it is so
5 characteristic of the entire EIS. The entire draft, as
6 far as I am concerned, is biased. The guys that wrote
7 this thing are trying to make it look like an objective
8 discussion. It is obvious it seems to be justifying the
9 reasons for not entering these three areas in the wilder-
10 ness.

11 Now, I wrote this prior to being informed by
12 Senator DeConcini that we were going to have this meeting,
13 and so in effect this next paragraph probably doesn't
14 apply anymore. However, I felt that the three hearings
15 in Utah and one in Phoenix would have been a blatant over-
16 sight of the people in northern Arizona here, and it would
17 seem to me that they were trying to make the destiny of
18 this area determined in Utah, not in Arizona. And I can
19 still back that up because in your cooperative agencies
20 you have listed in there, you don't have anything sent to
21 the Coconino County in which two of these areas reside in
22 this county.

23 In fact, I almost wrote the Civil Rights
24 Commission on this. I felt that since we weren't going
25 to have a say-so in this state or this county, we had a

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little violation here.

Now, all of this talk about geology, plants, animals, et cetera, is very nice. It is very pertinent, but let's don't fool anybody. The animals, plants and geology don't vote, have no voice or money involved in this matter of making the final determination.

Now, on Page 29 under the heading of Economic Conditions there is mention population, employment and income. The only data presented for '77-'78 shows 55 percent of the population employed in the service and retail trade sector, not in farming and ranching. The next most important point brought out is the other area of earnings is in the government sector providing 24 percent of the ESA income. Incidentally, you haven't defined where the ESA boundaries are too well yet.

On the same page we find a statement that the, "Residents of the ESA intensely oppose Federal agency regulations, including the ELM proposal and its alternatives to designate Parie and Petite Primitive Areas and Vermillion Cliffs Natural Area as wilderness."

According to the report the people rely heavily on government funds; yet they don't go along with the regulations. The above statement includes the government employees. Then as far as I can see, they are not doing the job as the Congress directed the agency to do. In the

private sector you people would be fired.

Now, I see you had a social scientist in the area, and his or her work is important in understanding my presentation of a slanted report that seems to be doing an adequate performance as required by law.

The section on Page 29 is subtitled Social Traditions. We find the statement that says: "Historically southern Utah and northern Arizona communities have been culturally homogeneous. The values of this cultural homogeneity stress small town virtues of neighborliness, friendliness and mutual self-help and emphasize close family ties, family pride, economic independence, local autonomy and a strong religious life."

The social scientist goes on to state, "In the past couple of decades events have created pressures to undermine this cultural homogeneity." The pressures are coming from the outside. They feel the Federal bureaucracy is increasing control over the community life. They say, "These people view with bitterness the environmental protection policies effecting the potential coal development and power generation that have stopped industrial growth."

Let's look this all over very carefully, because I am firmly convinced right here in this particular section that I quoted, the decision on these three

areas isn't already predetermined by the ESA.

The social scientist tells us the communities of southern Utah, northern Arizona, have been culturally homogeneous. That is very interesting since in northern Arizona we have Paiute, Navajo and Hopi peoples plus very ethnic groups in towns like Flagstaff where there is a high percentage of Hispanic names, so obviously he meant southern Utah, not northern Arizona. Why is this oversight? Because the people of Coconino County were ignored. They don't count. It seems we are segregated from this homogeneity.

The first cultural group in the Arizona Strip was historically homogeneous. I go along with that. They were all Paiute. This, too, seems to be overlooked.

On Pages 20 and 22 their statements, which I quote: "Having been used by the Paiutes the primitive eree also has the potential for sacred sites, plants and animals." However, apparently these people weren't contacted in order to verify this statement, and I doubt that it would have been that difficult. Incidentally, by not verifying this statement, you may find that you are not in line with the Native American Religious Freedom Act.

But since the BLM social scientist recognizes only one cultural group as being in existence, it is

obvious that all the adjectives mentioned by him prevails only within a single racial-religious group. It is apparent this particular group is going to make the decision on these three areas.

Now, the desire for industrial growth, the coal mine, power plant makes the idea of economic independence very questionable. The corporations involved in industrial growth would be definitely outsiders, and they would bring in even more outsiders. Check on the outsiders the Selt River Project brought into Page, the scab labor as the local Nevejos would be laid off, which has just happened this month. This would doom the cultural homogeneity far more and faster and more completely than making these areas into a wilderness.

I recommend the social scientist talk to the Navajo about what happened to their quiet, peaceful, traditional life when the Grand Canyon Dam was built, the company town of Page and the power plants. Also ask the residents of Black Mesa what happened to their lives when the coal mines opened up.

The people of the ESA think the Federal bureaucracy is increasing pressure on their lives. Do they really think it would be less by not having wilderness than having industrial growth? Just wait until they feel the impact of a real racial-religious mixture that

1 growth can bring them, and I know they'll love the United
2 Mine Workers and the Teamsters Union along with everything
3 else.

4 I am willing to bet that they would be the
5 first ones to seek some sort of top solitude in the
6 wilderness areas. They will retract their idea that
7 population growth is beneficial. Those of us in Arizona
8 can tell them all about a mess called Phoenix. If you
9 don't like that one, try L.A.

10 I believe I shot some holes in your impact
11 statement in regard to some aspects. In Section 5, Page
12 61, entitled "Consultation and Coordination," and this
13 is repeating myself, I do not find any information concern-
14 ing Coconino County whatsoever, so apparently it doesn't
15 exist. Yet two of the three areas under consideration are
16 in Coconino County. Also not mentioned in other organiza-
17 tions we don't find the museum in northern Arizona or the
18 university in northern Arizona, and I think they would be
19 as good in there as some of the others. I am wondering
20 if it is purely accidental. In line with everything else
21 I brought up, I doubt it.

22 Now, this hearing reminds me of another set of
23 public hearings we just recently had in Coconino County.
24 I am referring in regards to saving the San Francisco
25 Peaks from desecration. During those hearings the Navajo

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1 and Hopi people spoke out against development because it
2 was against their religion and traditional life. They
3 were challenged by a group of what could be called out-
4 siders.

5 We have been informed that the outsiders have
6 as much right as local people to such a point that it
7 seems it is going all the way to Washington, D. C. upon
8 appeals of both groups.

9 So we know that outsiders have rights, too.
10 They have been informed that if it is ruled in favor of
11 the native American people, it will be taken to court on
12 the basis that it is unconstitutional for the government
13 to favor one religious group over skiers. It is an
14 interesting aside that the very man who caused this came
15 from Utah. It will be interesting to keep both of these
16 hearings in mind just to see how converted things can get
17 in respect to their final decisions.

18 Now, on Page 31 you will find one short para-
19 graph about outside interests. After reading it several
20 times I am still wondering exactly what it says. Perhaps
21 a couple of statements on Page 29 might help clarify the
22 situation. I quote the first two sentences. "Two
23 population groups have strong feelings toward wilderness
24 designation in the Arizona Strip: local residents and
25 outside interests. To determine local attitudes, a BLM

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1 social scientist interviewed 32 residents of the ESA,"
2 again not defining what the boundaries are, "representing
3 a range of ages and occupations, locally elected officials,
4 county commissioners and members of city councils."

5 Exactly who these represent were never pre-
6 sented, but they are not identified as being from
7 Coconino County. If there are only two groups, then why
8 wasn't there more information presented on the outsiders,
9 and I think maybe we are outsiders.

10 At this point I would like to digress a bit to
11 stress a factor in this case in the matter of the cities
12 in northern Arizona. Using the first one here about
13 northern Arizona, Flagstaff, because it is the largest and
14 the county seat. Then in this category we are next
15 confronted with a town called Page. Using the criteria
16 set forth in this very statement of yours, Tuba City and
17 Moenkopi take precedence over Page. To put it in perspec-
18 tive, Page is so new the paint is barely dry on the
19 buildings, and it's a creation of federal bureaucracy.
20 Tuba and Moenkopi again are older and have any amount of
21 traditional families whose ancestors go further back than
22 anybody from the Mayflower.

23 On the basis I presented I can honestly say
24 this EIS leaves a lot to be corrected. It points up that
25 it is altogether -- put together to please one segment of

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1 the population.

2 In closing I feel it is in the best interest
3 of the citizens of Arizona and Coconino County that all
4 three areas be accepted under Alternate Number 2, and that
5 that plan is insufficient since I consider the areas too
6 small.

7 I also have a mention in here I think the
8 livestock permittees could have better access to particular
9 grazing units, but access only to the permittees and for
10 the purpose related to their livestock and no dude-
11 ranching. I feel the whole EIS needs a lot more work and
12 to correct the rubber-stamp position that it obviously
13 demonstrates. Thank you.

14 MR. GORHAM: Thank you, Mr. Beaver.

15 Mr. Carter would like to answer at least one
16 of your comments.

17 MR. BEAVER: I figured he might.

18 MR. CARTER: Just on Page 29 under "Economic
19 and Social Conditions" about halfway through the first
20 paragraph: "Named the environmental study area, ESA,
21 this area includes Washington and Kane Counties, Utah,
22 and portions of Mohave and Coconino Counties, Arizona,
23 north of the Grand Canyon and east to Page, see Map J-1,"
24 which is on the following page.

25 In terms of Page 61 and 62 this is an abbreviated

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list, and all of the entities that you named were mailed copies of this statement and did receive them. We made contact with them, and they have been consulted.

MR. BEAVER: They were omitted on the printing?

MR. CARTER: They haven't been included in this list because it was abbreviated. The list was 1,600 long.

Going to the —

MR. BEAVER: We resent Mohave getting precedence over us.

MR. CARTER: I am very sorry. Utah was very concerned you weren't included, too, in the hearing up there.

On the native — I don't know the act that you
quoted.

MR. BEAVER: Native American.

MR. CARTER: Native American. This thing went to the printer before he made that contact. Our cultural resource individual did make that contact.

MR. BEAVER: That's the same as the social scientist?

MR. CARTER: No, this was an archeologist that made the comments. That is all I have.

MR. BEAVER: Is he your archeologist or is it
a contract?

MR. CARTER: It is our archeologist.

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MR. GORHAM: That concludes the people who initially desired an opportunity to speak. As the meeting progressed, has anybody decided they would like to speak? Okay.

MR. RICKER: My name is Jim Ricker, R-i-c-k-e-r, and I am a resident of Arizona. I was born here, and I have been going up to the Vermillion Cliffs Area for as long as I can remember. They have always impressed me, and I went to Paria about nine years ago, and that really impressed me, and so I have come here to say my piece, and I appreciate the opportunity.

I believe the BLM did a fairly good job on the EIS in identifying the lands that had wilderness quality. I don't believe though that they included all of those lands in their recommendations, and particularly I am referring to the Vermillion Cliffs, the western portion. It's beyond me why it was not included.

The only place I can find here that it says on Page 3 of the Suitability Report in the second column, the first paragraph down, "The plains in the western portion of the natural area lack the high quality wilderness values of the cliffs to the east, and the BLM recommends they remain natural rather than become a part of the wilderness." That to me is a subjective and arbitrary definition, the cliffs to the west being of a lower

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[illegible]

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quality of wilderness characteristics, and therefore not included.

That is all I can come up with, yet they do have wilderness qualities as stated in the statistical summary on Page 13, "Acres with wilderness qualities, 22,285 recommended for designation. 27,850 recommended against." So I went back into the inventory itself, and I could find really outside of one point no other reason for that land to be excluded. Geologically it should be included because the cliff is an entire cliff that starts from House Rock Valley, rises out of the ground, goes east to the high cliffs that you find in the eastern portion.

In that section there are the anthropological sites you talked about. There are the historical trails of the Escalante and Honeymoon Trails. And they, of course, provide hiking and backpacking, horseback riding into the area.

The other primitive and unconfined recreations all had good opportunities, it seems to me, and I've been to the Vermillion Cliffs, and I could see no real difference in the two as far as that was concerned.

The naturalness, even though there were some imprints quoted on Page 94 of the Inventory together with the imprints of the grazing and mineral exploration do not degrade the overall naturalness of the unit. The only

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place I can see that it does not meet with the criteria in again on Page 94, the paragraph under "Solitude." In the last section it has, "As a result, a degree of solitude may be present in the plains area, but it should not be considered as having outstanding opportunities for wilderness."

Well, that again is a very subjective opinion as to what is solitude and what is not. And additionally it is only one of the many criteria which you are to base your judgment upon.

To allow motor vehicles and mining of the western portion would further compromise the naturalness and the opportunity for solitude, and I therefore recommend that all of the Vermillion Cliffs Natural Area and the other inventoried areas with wilderness characteristics, even though they may not be as high in value as the eastern portion of the Vermillion Cliffs, be included.

A larger area can only dilute the numbers of visitors providing better opportunities for solitude, and, of course, protection of the naturalness.

With the diminishing potential for wilderness areas in this country and for the rising need in terms of recreation and in terms of wildlife, I would believe that the Bureau of Land Management should take a very liberal view of wilderness. It seems like they have a certain

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1 amount of leeway in the interpretation of the law, and the
2 areas that can be included should be included.

3 These actions as it states in the Wilderness,
4 the Environmental Impact Statement, are neither reversible
5 irreversible or irretrievable. The wilderness is a little
6 different. Just as damage to the wilderness is irrever-
7 sible, so wilderness itself is irretrievable.

8 So I urge you to put in as much as you possibly
9 can legally. Thank you.

10 MR. GORHAM: Thank you, Mr. Ricker.

11 Is there a Rudy Lambertsy present? Be
12 requested to speak.

13 Does anybody else desire to speak?

14 Steven Schmitt? You're just in time.

15 MR. SCHMITT: I just got here. I just left
16 the area. That is what I wanted to say. I just got back
17 a couple of hours ago, and we hiked down from Buckskin
18 and back out Paria. My second time there. My first time
19 down in Buckskin.

20 I haven't got anything prepared. I just
21 wanted to voice some support for the area as one of the
22 most fantastic areas we have left around here.

23 And I was able to bring seven people from
24 Illinois to see this and they had the impression of their
25 live. I think, in this area. They couldn't believe it

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1 existed.

2 And I just want to make sure that more people
3 have that opportunity to see and express their feelings
4 like that. I think it was quite a learning experience
5 for everybody involved, too, and that is about it.

6 MR. GORHAM: Thank you, Mr. Schmitt.

7 Anybody else who would like to speak?

8 MR. MCKELLER: Yes, sir. My name is Steve
9 McKeller. I am a citizen of Flagstaff, and we in Flagstaff
10 feel very protective of the northern Arizona area, Arizona
11 Strip especially.

12 And as the gentleman before just mentioned, it
13 is a very special area, and I personally, and a number of
14 people I know, personally feel the best protection for this
15 area is wilderness. I personally would like to see
16 Alternative 2 adopted.

17 And I just -- what I really wanted to do, I
18 wanted to augment what Dawson Henderson said earlier in
19 the meeting about using the argument of if the area
20 becomes wilderness, it is going to attract more people,
21 and it is going to have a greater impact on the area, be
22 it biological or archeological or whatever. I heard this
23 argument used over and over again, and never have I seen
24 any facts in this statement or any statement by the Bureau
25 of Land Management or the Forest Service or whatever

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1 as to how many people do attend wilderness areas.

2 For instance, the Gulura Area 50 miles from
3 Tucson is the least-used wilderness area in the United
4 States. It gets perhaps maybe -- I forget the exact
5 number, but it is four to six hundred visitor use days
6 per year.

7 If you are going to make the statements, we want
8 to see wilderness areas and how many people are going to
9 them in relationships to population centers and things
10 like that. You didn't have that in here. They just say
11 it. It is just too subjective. It isn't right to do
12 that. That is all I have to say.

13 MR. GORHAM: Thank you.

14 Anybody else? Anybody have any questions of
15 a clarifying nature they would like to address to any
16 members of the panel? Go ahead.

17 MR. HENDERSON: Dawson Henderson. Page 28
18 under Government Controls and Constraints, the second
19 paragraph, it says: "The eastern portion of Paria Canyon
20 and the northeastern corner of these Vermillion Cliffs
21 had previously been withdrawn by the Water and Power
22 Resource Service as part of its water storage project on
23 the Colorado River system. These areas were thus not
24 classified for multiple-use management and are still
25 withdrawn for WPRS use."

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1 "The impact of these withdrawals on designating
2 Paria Canyon or the Vermillion Cliffs as wilderness areas
3 is not certain."

4 And I just wondered if you could shed any
5 light on that paragraph, anyone.

6 MR. LEVITT: Okay. What it amounts to, it was
7 not classified for multiple-use management when we were
8 doing classification which was required by the
9 Classification Act of 1964, so as a result if this was
10 relinquished, there would be no classification on those
11 lands.

12 As far as the multiple-use management, they
13 would probably, I think, be open to many uses, perhaps
14 agricultural, mining, whatever.

15 MR. HENDERSON: How does this deal with wilder-
16 ness status? Is it a problem?

17 MR. LEVITT: I really don't know. It is still
18 undetermined, I guess. If it did go wilderness, it would
19 have the protection of the Wilderness Act. It may be
20 protected.

21 MR. HENDERSON: So Congress is more powerful
22 than the WPRS?

23 MR. ROYER: Can I address that? We encountered
24 this withdrawal. It extends into the Utah portion of the
25 unit of the Paria Primitive Area 2, and it certainly won't

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1 constrain Congress and how they would act.

2 Of course, if the legislative power would
3 control our withdrawal, but it does cloud to so extent the
4 reviewability of those lands because they are withdrawn
5 by the Bureau of Rec, and I think that's what the state-
6 ment refers to -- that is what the statement is referring
7 to in the ES is that does Section 603(a) of FLPMA apply
8 to that particular withdrawn land? And there was no
9 answer. I don't think we have an answer on it.

10 MR. GORHAM: Go ahead.

11 MR. CARPENTER: There is also one additional
12 item relative to this. That is that all withdrawals are
13 periodically reviewed, and this one is under review at
14 this particular time, and there has been some discussion
15 as to whether or not this withdrawal would be relinquished.
16 That seems to be what will likely happen.

17 And if that does happen, then Ferron has told
18 you the possible consequences.

19 MR. GORHAM: Mr. Henderson, it is really a
20 complicated legal thing within the government as to the
21 withdrawals, and what this statement is really saying, and
22 I am not suggesting that you ask our office, but they
23 haven't requested a legal opinion on this question.

24 And Reclamation has withdrawn a lot of land
25 all over the West including especially in Arizona, and

1 they have for a long time.

2 If this withdrawal is essentially revoked or
3 withdrawn voluntarily, the lands will not automatically be
4 reopened to entry. There has to be a public land order,
5 and in all probability at that time then, depending on the
6 status of the surrounding lands and what is part of it,
7 obviously consideration would be given as to include it in
8 the wilderness if -- wilderness designation, if that is
9 fact comes about. But I am sure that within the --
10 because we are working with the same agency, the
11 Department of Interior. All agencies are involved with
12 the Department of Interior. And certainly what is best
13 is compatible to the use of the land and the public would
14 be considered.

15 MR. ROYER: I might point out, too, the
16 Secretary of the Interior designated the Paria Primitive
17 Area after the withdrawal designation, the withdrawals
18 were made. And that the Paria Primitive Area and FLPMA,
19 the Federal Land Policy Management Act, does say that
20 areas that were designated by the Secretary of Interior
21 as primitive prior to 1975 must be reviewed as instant
22 study areas.

23 So there is that statement of posture, I guess,
24 from the Secretary of Interior regarding this.

25 MR. GORHAM: Just for general information, this

1 type of problem is not singular to this particular piece
2 of land. This happens a lot of times of overlapping
3 withdrawals and plans. And Reclamation, as I said, has a
4 lot of land withdrawn, and they are very jealous about the
5 land they try to use.

6 Any other questions?

7 MR. PETERSON: Just for clarification, for
8 written comment we are given 30 days from July 1, is that
9 correct?

10 MR. GORHAM: Well, we think that the mineral
11 report hopefully will be out by July 1. There will be
12 adequate notice when that report is made available to the
13 public. As I understand it, it is at the printer now or
14 in the process to the printer. And so it would be safe to
15 say you would have 30 days somewhere from July 1st.

16 MR. PETERSON: For statements pertaining to
17 this EIS?

18 MR. GORHAM: The entire document.

19 MR. PETERSON: July 1.

20 MR. CARPENTER: As well as the mineral report.

21 MR. GORHAM: As well as the mineral report.
22 You would send those to the State office in Phoenix to
23 Mr. Whitlock.

24 A lot of you probably haven't seen this docu-
25 ment prior to tonight. I would suggest you avail yourself

1 of the opportunity to read it and submit written comments
2 if you so choose, and obviously based on some of the dis-
3 cussion tonight and last night and other meetings, certain
4 paragraphs, sentences, entire subjects in which you might
5 want to comment on.

6 MR. ROYER: I would like to point out one thing
7 about the comment process, too, is that there are two
8 things that are being commented on here. And throughout
9 all of the hearings that I have attended most of the
10 comments have been addressed to the Environment Statement
11 Alternatives, but the Suitability Report and the yellow
12 portion of the yellow document is also being -- is the
13 critical report that will be submitted to the President,
14 and that does not reflect any of the alternatives in the
15 ES. It's a combination as it says of several alternatives,
16 so comments should be addressed to both documents within
17 the publication.

18 MR. GORHAM: Anything further?

19 MR. RICKER: I have a question. You had some
20 hearings in southern Utah. How did these people feel about
21 these areas?

22 MR. GORHAM: I'll refer you to the panel
23 because I didn't preside at that.

24 MR. RICKER: The majority of the area is in
25 Arizona, and I am wondering how much this is going to be

1 weighted. Therefore, I am curious as to how they feel
2 about it as to how we feel about it as far as it being
3 protected as a wilderness. What kind of feedback did you
4 get?

5 MR. CARTER: In Salt Lake the feedback was
6 basically the same as what you have given us here. I
7 will get some agreeing or disagreeing here.

8 In Kanab it was mostly in opposition with one
9 person who testified in favor.

10 In Kanab -- or in St. George it was approxi-
11 mately equal.

12 And that is agreeable?

13 MR. CARPENTER: Yes. Perhaps a little more
14 amplification. Some of the comments that were brought up
15 were not made a part of the record, and as I understand
16 your question you really want to get a feeling of the
17 pulse of what a lot of them felt, and the comments by
18 some of those present, at least at the St. George meeting,
19 was that if there are areas where we have wilderness
20 designation in the Arizona Strip, that these areas are
21 them. That was kind of a consensus by many of the people
22 there. Although there was opposition also.

23 MR. BEAVER: What about Phoenix and Kingman?

24 MR. CARTER: Phoenix was mostly favorable
25 towards wilderness designation with some four-wheel drive

1 enthusiasts that were somewhat opposed. They were taking
2 some of the top of the Paria Plateau opposing it. Kingman
3 yesterday, there was a lot of concern of taking large
4 acreages -- or last night -- large acreage. They weren't
5 necessarily opposed to wilderness designation, but they
6 were a little opposed to like ninety-five or ninety-three
7 thousand acres.

8 MR. GORHAM: There was some expressed concern
9 last night as to the weighing of the mineral potential
10 against the wilderness designation. That was by one
11 particular party.

12 Anything further?

13 We thank you for your comments on that portion
14 of the meeting. We now have the second portion of this
15 meeting, and it will be conducted by Dan Sokal,
16 Recreation Planner of the Shuvitz Resource Area, who will
17 deal with the informal question-and-answer period as to
18 proposals to limit the use of off-road vehicles in that
19 resource area.

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C E R T I F I C A T E

I HEREBY CERTIFY that the proceedings had upon
the foregoing hearing are contained in the shorthand
record made by me thereof, and that the foregoing 41
pages constitute a full, true and correct transcript of
said shorthand record, all done to the best of my skill
and ability.

DATED at Phoenix, Arizona, this 8th day of
June, 1980.

Madeline A. Castle
Madeline A. Castle
Court Reporter

NEAL R. GROSS
COURT REPORTERS AND TRANSCRIBERS
1230 VINTAGE AVENUE, NW
WASHINGTON, D.C. 20005

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UNITED STATES OF AMERICA
DEPARTMENT OF INTERIOR
LAND MANAGEMENT, PUBLIC HEARING

In the Matter of:

The Draft Suitability Report and Draft Environmental Impact Statement for the Proposed Wilderness Designation of Instant Study Areas for the Arizona Strip District, Northern Mohave and Coconino Counties, Arizona, and Kane, Utah.

Board of Supervisors Auditorium
111 South Third Avenue
Phoenix, Arizona
Thursday, May 8, 1980

The Proceedings in the above-entitled matter came on for hearing, pursuant to notice, at 7:40 p.m.

BEFORE: ROBERT MOELLER, Hearing Officer

APPEARANCES:

GLEN CARPENTER, Wilderness Coordinator, Arizona Strip District.
DENNIS CARTER, Environmental Systems Director, Arizona Strip District.
WILLIAM TEMPLETON, District Manager, Arizona Strip District.

REPORTED BY: R. G. Baarstad

PREPARED FOR:

(COPY)
Holiday & Associates
Official Court Reporter
222 NORTH CENTRAL - SUITE 600
PHOENIX, ARIZONA 85004
TELEPHONE 224-6388

Phoenix, Arizona
May 8, 1980
7:40 p.m.

THE CHAIRMAN: Ladies and gentlemen, let the record show that this hearing is being convened this evening at approximately 7:30, or, I'm sorry, 7:30 or 7:40, at Phoenix, Arizona, at the Board of Supervisors Auditorium, 111 South Third Avenue, on May 8th, 1980.

I'd like to welcome you here this evening to the third in a series of public hearings on the Draft Suitability Report and Draft Environmental Impact Statement for the Proposed Wilderness Designation of Instant Study Areas for the Arizona Strip District for the Northern Mohave and Coconino Counties, Arizona, and Kane County, Utah.

The statement includes such areas as Paria Canyon, Pate, Vermilion Cliffs natural area.

The hearings are held pursuant to the Wilderness Act of 1974, the Federal Policy and Management Act of 1976, and the Natural Environmental Policy Act of 1969.

The purpose of the hearings is to receive your comments on the draft suitability report in drafting the Environmental Impact Statement.

We have previously held hearings at Salt Lake City, Utah, and Kanab, Utah, and St. George, Utah. And as to the hearing this evening, the Bureau of Land Management has scheduled hearings in Kingman, Arizona, on June the 3rd.

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at the English Building, Mohave Community College, 1971 Jaggerson, at 7:30 p.m., and in Flagstaff, Arizona, on June 4th, 1980, at the Evergreen Roja, 1010 East Sstanima, 7:30 p.m.

As I understand the testimony to be taken this evening, the Bureau of Land Management will extend the written comment period on the draft document until 30 days after the U.S. Geological Survey and Bureau of Mines' Minerals Report is made available to the public, and the date that it's made available, I believe, will be published in the Federal Register.

So that those of you who don't wish to testify orally this evening can submit written comments during that period. Your written comments should be sent to the State Director, Bureau of Land Management, 2400 Valley Bank Center, Phoenix, Arizona, 85073.

Regarding a few sort of mechanical rules in the conduct of the hearing this evening, each witness is allocated approximately ten minutes to testify this evening. When you are called to testify, just come on up to the podium here and give your name and spell your name, and if you represent any organizations, you may express what organization you represent.

The panel here this evening are officials from the Bureau of Land Management, and I'd like to introduce

them to you.

To my right is Dennis Carter. He's the Environmental Systems Director from the Arizona Strip District.

Then there's Glen Carpenter, who is the Wilderness Coordinator in the Arizona Strip District, on my far right.

To my left is Bill Templeton. He's the District Manager of the Arizona Strip District.

They are here tonight to personally receive your public comments on the draft statement.

I will permit questions of them regarding clarification, points of clarification of the document. I don't think I will permit, however, cross-examination of the witnesses, because this is not intended to be an adversary hearing. But if you are interested in factual issues dealing with this statement, or a point of clarification that you'd like to ask questions of them of, that's perfectly appropriate.

We have a list of people who have expressed a wish to testify tonight, so I'd just like to call your names, and come on up and feel free to testify as I call your name.

The first witness is George Schade, I believe. Mr. Schade.

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MR. SCHADE: Do you want me to face the crowd or face you?

THE CHAIRMAN: Fine. It doesn't matter. Just face the —

MR. SCHADE: My name is George Schade, S-c-h-a-d-e, 2839 North 49th Place, Phoenix, Arizona. I have usually represented the Arizona State Association of Four-Wheel Drive Clubs at these meetings. I'm not here representing them tonight. I am representing myself.

I received this document about three weeks ago, and I have looked through this document, I have read it, and I have looked through it almost every day in the past week. I really don't have that many comments to give you.

I have no facts to dispute any of the information that I see in this draft, environmental statement. I figure the Bureau of Land Management has spent maybe years compiling this information, and I, frankly, am not up to the task to dispute any of this environmental information, and so I thought about it longer. And I thought, boy, I have nothing to do, and since I came here first tonight, I guess that's how I got to be first on your list.

And about the only thing that I would like to say is that this environmental statement in here indicates that there are two groups that oppose wilderness designation, the local residents and scattered support from outside

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interests, naturally, and internally. And I would like to say that there's opposition to wilderness in general beyond local residents.

I know I live here in Phoenix, and I oppose wilderness designation to the extent that it's being called upon by the Bureau of Land Management, and I notice that a lot of people that I work with and that I have represented previously do oppose wilderness designation, and to that extent, I would ask that the Bureau of Land Management amend their environmental statement to indicate that there's a large-scale broad concern, which could be called opposition, throughout this state to wilderness designations in the state, and that should be reflected in this environmental statement.

From what I have read, and from what I have seen in this picture and another picture, Paria and the Piute areas are two beautiful areas, and frankly, I think that political realities are such that both of these areas will probably become wilderness.

I have little problem with the Piute area, it's been closed for years and years, at least since 1975.

With Paria, I think I do have a problem with Paria. The wilderness study for Paria has expanded beyond the established boundaries of the canyon, and there are a lot of references in the environmental statement to

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contiguous areas, the possibility that the Paria wilderness area will be in excess of 100,000 acres, and right now the existent boundaries of that area are relatively low, 25,000 acres, of which 18,000 are located in Arizons. I am very concerned that Paria will wind up being a 100,000-plus-acre wilderness area, and that we would oppose.

I would request that the Bureau of Land Management expedite this study of the contiguous areas to Paria, and to stop the additional wilderness designation so that what is a 25,000 closed area today will not become four times that. Otherwise I really have no comments.

But since this record, I understand, is going to Washington, D.C., and to higher-ups back there who will read it, I do want them to know that George Schade came down here. He was the first speaker. He expressed his concern about wilderness designation. He's generally opposed to wilderness designation, and that there are other people, in my opinion, many people, besides local residents that do oppose wilderness designation. Thank you very much.

THE CHAIRMAN: Thank you, Mr. Schade. On our register here, you indicated that you were representing the Arizona State Association for Four-Wheel Drive Clubs. Do you want the register to reflect that you were speaking on their behalf?

MR. SCHADE: Yes. I would like the record to show

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that the Arizona State Association for Four-Wheel Drive Clubs will be answering a formal statement through another party. I am here as an individual tonight.

THE CHAIRMAN: Thank you. Our next witness is Linda Lewis, representing the Sierra Club. Miss Lewis.

MISS LEWIS: My name is Linda Lewis, L-e-w-i-s. I live at 3737 North Country Club Road, Tucson, Arizona. I'm speaking on behalf of the Grand Canyon Chapter of the Sierra Club West, the Arizona State Chapter of that organization.

Overall, we feel that the draft environmental statement and the wilderness suitability report for the Arizona Strip is a well-written, concise, complete and well-printed document. We do feel that there are some things that require comment, and I'll go into those now.

The description of Alternative 1, which is called the No Action Alternative, requires, we feel, some clarification. Although not mentioned on the page, the discussion of the environmental consequences on Page 52 indicates that that alternative involves eliminating preference for roads in the Piute primitive area. Though the documents indicate that the intentions are to maintain the current management, this alternative could potentially have far greater impact. We feel that the only real no action alternative is to maintain primitive designation.

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3 the existent boundaries of that area are relatively low,
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5 am very concerned that Paria will wind up being a 100,000-
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16 concern about wilderness designation. He's generally
17 opposed to wilderness designation, and that there are other
18 people, in my opinion, many people, besides local residents
19 that do oppose wilderness designation. Thank you very much.

20 THE CHAIRMAN: Thank you, Mr. Schade. On our
21 register here, you indicated that you were representing
22 the Arizona State Association for Four-Wheel Drive Clubs.
23 Do you want the registrar to reflect that you were speaking
24 on their behalf?

25 MR. SCHADE: Yes. I would like the record to show

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1 that the Arizona State Association for Four-Wheel Drive
2 Clubs will be answering a formal statement through another
3 party. I am here as an individual tonight.

4 THE CHAIRMAN: Thank you. Our next witness is
5 Linda Lewis, representing the Sierra Club. Miss Lewis.

6 MISS LEWIS: My name is Linda Lewis, L-e-w-i-s.
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11 Overall, we feel that the draft environmental
12 statement and the wilderness suitability report for the
13 Arizona Strip is a well-written, concise, complete and
14 well-printed document. We do feel that there are some
15 things that require comment, and I'll go into those now.

16 The description of Alternative 3, which is
17 called the No Action Alternative, requires, we feel, some
18 clarification. Although not mentioned on the page, the
19 discussion of the environmental consequences on Page 57
20 indicates that that alternative involves eliminating
21 preference for roads in the Piute primitive area. Though
22 the documents indicate that the intentions are to maintain
23 the current management, this alternative could potentially
24 have far greater impact. We feel that the only real
25 no action alternative is to maintain primitive designation.

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Alternative 3, as it's stated, cannot be properly termed a no action alternative, and the reasoning behind this and the possible ramifications need to be expanded upon in the final statement.

We feel that the draft overemphasizes and exaggerates the potential negative impact of wilderness designation. In fact, what we are essentially doing is maintaining management and changing the name of the area. Wilderness is the best tool that we have for protecting natural values in the United States. Although often, however, we take all of its positive merit for granted.

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The draft mentioned, in several places, that the proposed action will have a negative impact on the naturalness of the visitor-carrying capacity recommended. The reality is that visitor use has increased some 300 percent in seven years. There's no reason not to assume that visitor use is going to reach carrying capacity regardless of what title the area is given.

A second example involves environmental consequences upon cultural resources as discussed on Page 52. The document states that the main impact of the proposed action and Alternatives 1 and 2 would be more vandalism from increased visitor use. Again, these resources are vulnerable, a myriad of potential destruction, including vandals, and will be more so with every passing year without

wilderness protection.
We found the summary stated in the draft to be inaccurate. As a result of the Paris River complex, maintenance of the normal stream flow in the Paris and tributaries and continued function of the natural flow into the complex are essential to the values of this area. We request that this issue be addressed in the final document and be a management priority for the area.

The draft outlines the definition of wilderness from the Wilderness Act of 1964. However, it doesn't include other pertinent sections of the act. Public understanding would be certainly refined by including the act in its entirety as an appendix.

And an example is illustrated on Page 52, where the draft states, additionally, will preclude oil, gas and mineral exploration and development, except that as allowed by Section 4 of the act. It is important for the reader to know what Section 4 says. And we feel that should be available to him or her in the document.

The term of livestock raisers requires a little revision, we believe, on Page 57. It's stated, lack of maintenance of existing resources would allow them to deteriorate. The Wilderness Act says that grazing can continue, and this means, according to Congress, that existing range improvements can be maintained, even using

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the motorized equipment when other means are impractical. The statement is, therefore, misleading. Furthermore, the wilderness suitability report states, on Page 8, that no livestock in the area presently require mechanical service.

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The public attitude section also is a bit unbalanced. A determination that local residents invariably opposed federal regulation and wilderness designations, this conclusion is based on 32 interviews by BLM. We feel that if the document includes such material, it should also address questions such as whether or not subjects were chosen at random, what they were asked, what material was quoted, what information was given to them, and how the attitude of the rest of the American people are relegated to one outside interest.

These three areas under study are part of what is often called the most beautiful corner of the earth. We feel that the attitude of the American people who own this public land are no less important than those of the people who live nearby, whether they are wilderness supporters or wilderness oppositionists.

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The draft states greater support for the proposed action is primarily concentrated in groups concerned with wilderness designations, including hikers, backpackers and conservationists. The statement is irrelevant. The fact

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that American businessmen, housewives, lawyers, carpenters, doctors, scientists, laborers, students, join conservation organizations as a means of promoting protection of American soil is not something we feel should be dealt with by relegating it to one paragraph or including all Americans who support wilderness protection in that group.

We support wilderness designation for the Piute primitive area, the Paris Canyon and the Vermillion Cliffs natural areas in their entirety, with a small omission due to lack of naturalness, which are outlined in the draft.

We commend the Bureau for recognizing the importance of the Coyote Buttes areas in Alternatives 1 and 2. The Paris Plateau offers very special opportunities for an experience of solitude and for very primitive recreation.

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Finally, the draft is rather confusing with regard to the fate of contiguous land, not which, according to the government, includes most of Units 1-8 and 1-6. On Page 53, the draft states designating only part of the contiguous would be protected. Any remaining land to be determined through complete inventory to have wilderness character. We cannot support any alternative which would preclude any inclusion of qualifying areas. Once a complete study has been done, we urge that this be clarified in the final statement.

One last point, we urge the Bureau to pursue the management priority as stated on Page 71, to investigate the power and water resource and obtain complete jurisdiction in this area.

Thank you.

THE CHAIRMAN: Thank you, Miss Lewis.

Next witness is Jerry L. Maggard. Mr. Maggard, you had a question by your name. Do you wish to testify?

I'd like to caution you who speak to slow down a little bit for the benefit of the court reporter. It makes it a little bit easier for them to get all the testimony.

MR. MAGGARD: My name is Jerry Maggard, representing the Arizona Mining Association.

We have no specific comments to make at the present time. It is my understanding that a mineral report will be issued before the final Environmental Impact Statement will be published, and that there will be an opportunity for comment on the complete mineral report before the final Environmental Impact Statement is published. Am I correct in that?

THE CHAIRMAN: Yes.

MR. MAGGARD: Then in addition to that, we only express our concern with respect to the acknowledgement and recognition of the mineral potential that does exist in some of these areas, particularly the oil and gas

potential, and to recognize that even though these are areas, maybe relatively small in comparison to the entire area of public land, it is such actions as this, recognizing their scenic merit, but also recognizing that each individual area, as it is withdrawn, has come to amount to from one-half to three-fourths of the total public land being withdrawn from natural resource development. And we just urge caution as these individual, relatively small areas, are examined, to realize that what the whole picture is.

We'll reserve our further comments for the mineral report, when it is issued. Thank you.

THE CHAIRMAN: Thank you, Mr. Maggard. I'd like to comment, too, that the Bureau of Land Management will give equal weight to either written or oral comments, based on their merits. There won't be any distinction between those.

Our next witness is Sherman Cawley, representing the Sierra Club.

MR. CAWLEY: My name is Sherman Cawley, C-a-w-l-e-y. And I live at 818 East Devonshire, Apartment 104, here in Phoenix. And I'd like to speak on behalf of the wilderness proposals.

I support wilderness designation for all three of these areas. I'm especially aware of the extreme popularity that the Paria Canyon area is to backpackers and hikers

throughout the Southwest. And I would like to call to everyone's attention the graph indicated in the proposal for that particular area, showing the extreme amount of use by hikers and backpackers in that area. It's extremely popular and very well-known for its outstanding natural qualities.

I would also like to comment briefly on the compatibility of wilderness designation as a land use by the BLM, with other land uses. For instance, grazing. Grazing is a compatible land use with wilderness designation on lands that are included within the natural wilderness recreation system. And I'd like to stress that to people.

There are also quite a few other values which are compatible with wilderness designation, including such things as archeological sites, protected wildlife habitats and the like.

I also support wilderness designation for the Piute primitive area and also the Vermillion Cliffs natural area. And I'm aware that the Bureau of Land Management is going to recommend some of the contiguous land to those — especially the Paria Canyon area, as a wilderness study area. And I would like to recommend to the Bureau that they include their studies of these contiguous lands in their study of the suitability for wilderness

for the Paria Canyon, especially.

One of the things I have heard about this particular area is that the Coyote Buttes area, already looked at by the Bureau of Land Management, is a very beautiful area and very much worthy of being included in the wilderness proposal.

I guess that's what I'd like to say. Thank you.

THE CHAIRMAN: Thank you, Mr. Cawley.

Our next witness is Debbie Eastburn.

MS. EASTBURN: My name is Debbie Eastburn, E-a-s-t-b-u-r-n. And I live at 3747 East Valley Drive in Phoenix. This won't take too long.

But I'm a representative of the Sierra Club, also. And I'd just like to say that I support wilderness designation for all three areas, Piute, Paria and Vermillion Cliffs.

I haven't actually visited these areas yet myself, but I know plenty of people who have. And I have seen a lot of pictures of them. And they are just beautiful areas. And I think they deserve all the protection we can give them. And the Bureau of Land Management has done a very fine job, I think, so far on these areas.

But I'd like to say, also, that I hope that they will include or at least study areas that are next to these lands and kind of expand on them a little bit.

And I support wilderness designation for a larger area.

And that's about it. Thank you.

THE CHAIRMAN: Thank you, Miss Eastburn.

The next witness is Bruce Burger. Mr. Burger.

MR. BURGER: I will submit a written comment.

THE CHAIRMAN: The next witness is Petty Morrison. You have a question mark by your name. Would you like to testify this evening?

MISS MORRISON: No, not tonight.

THE CHAIRMAN: And Jim Vaaler from the Sierra Club. Mr. Vaaler, would you like to testify this evening?

MR. VAALER: Yes. My name is Jim Vaaler, V-a-a-l-e-r. I reside at 4644 East Montecito in Phoenix. I'll be short.

I'd like to say, I support wilderness designation for the Piute, Parie and the Vermillion Cliffs area.

I have been fortunate enough to go through Parie Canyon, and it was probably one of the most beautiful times I have ever had. It was just fantastic.

I'd like to say, I tried to go into Piute one time, and failed. The roads were too muddy. But I do intend on going back there backpacking. And I do hope that when I go there, it will be a wilderness area.

And I would urge the Bureau to study all adjacent areas to these three areas in regards to suitability for

expansion of the three areas.

That's all I have to say. Thank you.

THE CHAIRMAN: Thank you, Mr. Vaaler.

The next witness is Jim McCarthy from the Sierra Club. Mr. McCarthy.

MR. MCCARTHY: My name is Jim McCarthy, M-c-C-e-r-t-h-y. Although I'm a member of the Sierra Club, I'm not really representing the Sierra Club. I'm a member of various other organizations. I'm here on my own behalf.

I'd like to state general support for the concept of wilderness. And the reason I have come here tonight is that approximately four weeks ago, I went on a backpack to the Nankipis Canyon. And on the way up there, we stopped just below the Vermillion Cliffs. And I camped out there. And I thought that it was an extremely beautiful area. And I think it definitely deserves protection.

That's all I want to say.

THE CHAIRMAN: Thank you, Mr. McCarthy.

The next witness is John Cartiere. You have a question by your name. Do you wish to testify this evening?

MR. CARTIERE: Yes, I will just say something, if you don't mind.

THE CHAIRMAN: Come on up.

MR. CARTIERE: My name is John Cartiere. And I have been out here about five years and involved in four-wheel

drive, more or less. But the way people are talking about this particular area, it sounds too pretty to put any wheel tires in there.

I just want to say we respect those areas that are so pretty you can't designate them anything but wilderness. But there is a lot of other areas that it takes a long time to get there, even with gas the way it is, that we can get to, and then hike in.

I'd like to work with the Sierra Club, along with the four-wheel drive association, and see if we can't work something out together, along with the BLM. And I'm going back East next month, so I won't be out here much longer. But it's been beautiful for five years. And I enjoyed it all.

Thank you.

THE CHAIRMAN: Thank you, Mr. Cartiere.

The next witness is Jean Pollan.

MS. MYEEM: I'm rather used to this. I answer to anything, as you notice.

My name is actually Jean Myeem, M-y-e-e-m. I'm an incoming state president of the Arizona Association of Four-Wheel Drive Vehicles. I would like very much to comment upon this, but the first time I saw it was out in the lobby. And as I remarked at that time, it's quite an imposing document. But I think most of you have covered it

well for me.

All these places sound fantastic. I'd love to see them all. But as I look around me, I think I'm sort of in the minority. My old legs won't carry me backpacking or even riding a horse anymore. Now in the world am I to see some of these things?

A VOICE: Lose weight.

MS. MYEEM: I'm afraid that my heart is a bit of a problem whether I were to lose weight or not. Have you any other suggestions?

A VOICE: Yes. I'll tell you later.

MS. MYEEM: Okay. Well, I'm afraid there are others like me, and we do want to preserve all the natural resources of this land that we can. It's a marvelous land. It's our land. But there are quite a few people like me that just can't walk in.

Thank you.

THE CHAIRMAN: Thank you very much. Is there anybody else that didn't get on the list this evening that would like to testify? Just come on up and introduce yourself and give your testimony.

MR. WRIGHT: My name is Tom Wright, W-r-i-g-h-t, 4725 North 78th Street, Scottsdale.

I arrived late, and I don't have a statement written out. I'll write a detailed letter with a specific

connect. But right now, I just want to make some short, off-the-cuff comments.

For one thing, responding to the lady who just spoke, since I arrived late, I don't know if there were slides shown of these areas --

MR. CHAIRMAN: No, there was not.

MR. WRIGHT: I have been to all three of these areas. Believe me, the only way to get there is to walk, because the Perie Canyon, for instance, is just straight up and down, mostly, and with a canyon bottom that is, in some places, more than 20 or 30 feet wide, quicksand. You cannot drive.

The Piute primitive area, that's all up and down with deep crevices and gorges. There are roads all around it, but there are no roads into it. It's just plain too rugged. You couldn't drive anything in there.

And the same for the Vermillion Cliffs, which is just all vertical rock. No possibility of any roads.

To get on to my main statement, I do support BLM proposals. Like I say, I have been to all three of these areas. I believe that the BLM has done a good job. I praise them for designating these areas, in the first place, as primitive and natural areas. And I support what they have proposed to expand them and to designate them as wilderness areas.

It is my belief that the areas should be -- I can't be too specific about this, but I believe they should be enlarged as much as possible under the wilderness designation. For instance, the Coyote Buttes area that were mentioned earlier. Now, I hiked the upper part of Buckskin Gulch, and saw a portion of the Coyote Buttes. At the time, I didn't even know what they were. I had not really known that area had even existed. But I was up on the rim and looked out and saw all this fabulous slick rock country, unique, outstanding country. And I believe that it absolutely does belong in any sort of protective designation for these areas.

I'm not advocating that Wilderness boundaries ought to be exploded out in all directions and put everything in. But I do believe that area, the Coyote Buttes and all the related rugged and beautiful country, as much as possible, should be included in the boundaries.

With the Perie primitive area, I was discussing even before that was a primitive area, with the BLM officials, about the boundaries. I believed at the time that they should have been bigger than it was, and bigger than it is now. I still believe that. And I would like to see the BLM look at the possibility of expanding that area as it is, and to include more of the area around Mountain Sheep area and more of the Virgin River Gorge

itself. There's a great deal of wild, spectacular, rugged country surrounding the existing primitive area that is not in the primitive area and is not in any of the prime alternatives that are being discussed now. And I would hope that the BLM would discuss that.

That's it. I will provide more detailed written comments later.

THE CHAIRMAN: Have I missed anybody now? Is there anybody else that wishes to testify? Just raise your hand and come forward.

If there isn't anybody else that wishes to testify, I'd like to thank you all for your comments tonight and for your attendance. And I will declare the hearing adjourned. Thank you very much.

* * *

I, R. G. BAARSTAD, do hereby certify that the foregoing 23 pages constitute a full, true and accurate transcript of the proceedings had in the foregoing matter, all done to the best of my skill and ability.

DATED at Phoenix, Arizona, this 24th day of March, 1981.

R.G. Baarstad
[Signature]
R.G. Baarstad

RESPONSES TO PUBLIC HEARING COMMENTS

- 1 - See introduction to final EIS.
- 2 - See introduction to final EIS.
- 3 - This comment refers to the report of the preliminary finding of wilderness characteristics for the primitive area and contiguous roadless areas in Utah. The preliminary finding was published in the Federal Register and a 30-day public comment period announced. The Utah State Director's final wilderness characteristics decision was announced in the August 31, 1979 Federal Register. The decision is identical to the preliminary finding. Both the Utah and Arizona wilderness inventories were reprinted as appendixes to the draft EIS. They do not refer to the Suitability Report. The Utah inventory was not used to determine the suitability of the area for preservation. The inventory only identified the areas in Utah with wilderness characteristics. These areas were then to be studied in order to make recommendations to Congress on its suitability for preservation as wilderness.
- 4 - Notoriety does provide the potential of attracting more people to a wilderness area. Proper visitor and resource management techniques however, can monitor and prevent impacts from degrading wilderness character.
- 5 - That is the correct change in average. The final EIS has been changed to show this.
- 6 - See introduction to final EIS.
- 7 - Designated wilderness is not intended to be inaccessible to the handicapped or to anyone else. The outstanding scenic and pristine character of the recommended areas has persisted largely due to their rough topography and relative inaccessibility to everyone. Those conducting the study had to helicopter to many areas and to hike several miles from vehicles left on the nearest roads or trails.

Although it is not feasible to have vehicular access into most of the area, a great deal can be seen from the boundary roads. Moreover, many people, including some handicapped, may enter on foot or horseback.
- 8 - Only a small area of the pinyon-juniper type along the edge of the Vermillion Cliffs would be affected. Furthermore, the Kaibab Plateau and the Buckskin Mountains remain more accessible to the Kanab-Fredonia area.

Woodcutting is not allowed under the existing natural and primitive area designations. In designating wilderness areas, the proposed action would merely continue existing policies.
- 9 - Most of the summary on Page 1 discusses individual resources. Point 3 discusses only cultural resources and is correct in its assessment that as more people find cultural sites, more impacts will result.

Point 4 addresses the total spectrum of scenic values. Sightseeing for cultural features involves a small portion of all scenic values. Although that value may be adversely impacted, designation would provide additional protection for all scenic values. Greater care, for example, must be taken in building range projects in designated wilderness. Visual Resource Management (VRM) guidelines allow projects to have more visual impacts outside a wilderness area than inside, where more mitigation of impacts is required.

Point 5, stating that all wilderness resources will be legislatively protected, is correct, since current protection has been developed through incorporation of public wishes into the BLM planning system and regulation and guidance provided at the Department and Bureau levels. Legislative action will incorporate current controls and provide for multiple use management while emphasizing management of the wilderness resource for all areas in perpetuity. This point does not conflict with point 6, which lists some of the results of increased visitor use in Paria Canyon. Some of those impacts would occur regardless of actions taken on the wilderness recommendation.

Management controls, however, are reducing the impacts, which are not expected to become significant. These impacts are occurring only within the canyon, while the rest of the areas are generally pristine.

10- The \$342,000 in the comment refers to an estimate of 1977 recreation users expenditures in the ESA. Since this figure amounted to less than 1 percent of the ESA's annual personal income, no estimate was made of how recreation expenditures would change in the future and impact the local economy. On the other hand, the \$504,000 and the economic benefits under the proposed action and alternatives 1 and 2 refer to benefits based on a recreation value that represents the dollar amount, over and above expenditures, that a recreationist would be willing to pay for the recreation experience.

11- It is unfortunate that search and rescue was not identified as an issue during the scoping meetings before the writing of the EIS. Without its recognition as an issue to address, we did not include it. The economic impact of search and rescue operations was not discussed in the EIS.

As you pointed out, however, most such expenditures are made by local governments. Search and rescue might benefit the local economy, since the money is received by local citizens.

Search and rescue is addressed in the current recreation plan for the Paria Canyon Primitive Area. BLM's intention is to cooperate with local governments in search and rescue efforts.

12- We regret that the Kane County entities were missed in the first mailing of the draft EIS and sincerely apologize.

13- Although what you say is correct, the expense incurred since the canyon has been in public use is insignificant.

- 14 - First, pages 27 and 28 do not discuss the impacts to the cattle industry. This section discusses only what livestock exist in the areas proposed for wilderness. This section is called "Affected Environment".

For discussion of impacts, see page 57. Assigning dollar values to inconvenience is difficult if not impossible.

- 15 - See introduction to final EIS.

- 16 - We have used lists of plants, data and definitions provided us by professionals in this field which include employees of the Smithsonian Institution, the Fish & Wildlife Service, six institutions of higher education in Arizona and Utah, and other specialists employed or consulted by BLM.

- 17 - Table 3-2 does give the location of each species listed. We do not have detailed information on the population status and other key biological parameters. The presence of these species in the identified areas has been documented.

The EIS also covers the Utah portion of Paria Canyon. Information on Utah sensitive species will be added.

- 18 - Table 3-3 does not represent just one man's personal value system. It is a compilation of data derived from the existing unit resource analysis and follows the prescribed procedures for evaluating the quality of different recreational opportunities. Your comments highlight the fact that some activities for some areas were not evaluated. The EIS was written using the best existing information on those activities. Rather than inserting information that had not been subject to the scrutiny of other evaluations, we identified the areas of inadequacy in the table. A comment by the Arizona Game and Fish Department about the quality of hunting has been considered and included in the table, with credit given to their contribution.

The meaning of the following comment is not clear: "...archaeological sightseeing always is not JUST sightseeing..." According to law, sightseeing and photography are the only archaeological activities allowed on public lands. Collecting without a permit is illegal.

- 19 - The final EIS has been corrected to eliminate the inconsistency.

- 20 - See comment 14.

- 21 - A member of the Kane County Planning Commission was telephoned and given the information on zoning in the area of Paria Canyon. We note this correction.

- 22 - Utah Department of Employment Security data cited in the document show that 1978 unemployment in Kane County was 4.4 percent and unemployment in Washington County was 3.3 percent. Preliminary data for 1979 estimated Kane County unemployment at 3.9 percent and Washington County unemployment at 3.8 percent.

- 23 - The Environmental Protection Agency has no power to reclassify the air quality of areas. Only the Governor may reclassify areas. An agency of the Federal Government may only recommend an air quality designation.
- 24 - We assume the Commissioners objection is aimed at the comment under Environmental Consequences on page 1, which states that the proposed action and alternatives 1 & 2 would have an impact which would "further restrict the exploration for and production of minerals in the areas..." Designation would be restrictive but would not necessarily eliminate exploration. This and other possible adverse impacts of wilderness designation must be weighed against the benefits of such designation.
- 25 - This statement was made in error. The word future should have been omitted. The contiguous lands will be considered in the future.
- 26 - See page 57 Livestock Grazing.

Wilderness designation would not affect grazing. Grazing continues in the wilderness system, and grazing privileges can be transferred to another individual for an allotment in the wilderness system. The grazing permit does not die with transfer.

Alternative 2 for the Paria Canyon would stop development of two wells in the adjacent Two Mile Allotment. Catchments would have to be substituted, and the cost would probably increase on each catchment by \$10,000. Cost for \$30,000 catchments would increase to \$40,000 due to the need to use more hand labor. The wells could not be dug because they would require that roads be built to the well site due to the allotment's sandy soil.

Site-by-site feasibility studies are and will be conducted as each allotment's development is started or continued. Maintenance of projects will continue on a site-by-site basis. Page 57 generalized about what could happen, but in most cases, the site feasibility will determine the viability of range developments.

- 27 - Flagstaff and the Navajo and Hopi Reservations are not part of the Environmental Study Area (ESA). Interviews were conducted with residents in all four of the counties in the ESA. (Washington and Kane Counties, Utah and Mohave and Coconino Counties, Arizona).
- 28 - See response to comment 27.
- 29 - This and other comments regarding the draft EIS recommendation to drop the western portion of the Vermillion Cliffs have caused the BLM to alter the original recommendation. The present recommendation is included in the new, revised Alternative 1. This alternative drops the western plains portion of the Vermillion Cliffs Natural Area from further wilderness consideration because of conflicts with proper grazing administration in that area. The remainder of the western portion, the cliff lines, will not be dropped or recommended for wilderness consideration until contiguous Wilderness Study Areas can be evaluated with the cliffs.

30 - See comment 4.

31 - Additional information on the support of or opposition to wilderness designation would not significantly alter the conclusions stated in the section on environmental consequences.

32 - This comment is covered under the new description of alternative 3 on page 6 of the draft EIS. The statement about returning the area to multiple use should also be removed as shown on the accompanying page. The area is now under multiple use management.

33 - See comment 4.

34 - The Wilderness Act of 1964 allows livestock grazing to continue. The Federal Land Policy and Management Act of 1976, however, allows livestock grazing to be continued "in the manner and degree in which the same was being conducted on the date of approval of this act (1976)". The maintenance or replacement of watering facilities, which requires heavy equipment, can be done; but where that replacement (or maintenance) would impair wilderness suitability, it can be stopped or prevented. The "manner and degree" is left to local authorities to determine, and all possibilities considered, maintenance and replacement of facilities could be prohibited. This is what's discussed on page 57.

35 - Although the document could have been expanded to include additional information on the social research design and methodology, the CEQ Regulations indicate that the descriptions of the affected environment "shall be no longer than is necessary to understand the effects of the alternatives" (Part 1502.15).

36 - The public comment period is not designed to "elicit public response to BLM's proposal." According to the CEQ Regulations, public comments shall "be as specific as possible and may address either the adequacy of the statement or the merits of the alternatives discussed or both" (Part 1503.3).

37 - See description of Alternative 1 in the final EIS.

32-6 - See response to 32-2.

32-7 - Interviews were conducted with residents in the portions of each of the four counties in the Environmental Study Area (ESA).

32-8 - See Introduction to final EIS.

34-1 - See Introduction to final EIS.

35-1 - See Introduction to final EIS.

37-1 - See Introduction to final EIS.

38-1 - Alternative 3--the No Action Alternative--is outlined as BLM understands the provisions of the Federal Land Policy and Management Act as it applies to wilderness review.

38-2 - See response to comment 1-2.

38-3 - The impact is based on the belief that wilderness designation would concentrate visitors in previously unvisited areas, creating the potential for an increase in vandalism.

38-4 - A copy of the Wilderness Act is printed with this final EIS.

38-5 - See Introduction to final EIS.

38-6 - Pearson.

38-7 - See Introduction to final EIS.

38-8 - Designating only part of the contiguous lands will not preclude similar action on other contiguous lands. All contiguous lands not designated but identified as Wilderness Study Areas (WSAs) 1-6A, 1-6B, 1-6C, 1-6D, 1-8A/19, and 1-8B will be studied further preparatory to a later recommendation on their wilderness suitability. The western portion of the Vermillion Cliffs Natural Area identified for further planning will be considered with contiguous WSA's to determine the entire roadless areas's suitability for designation.

39-1 - BLM is also concerned about the lack of surveys and special studies, but we have no funds for either Class I or Class II inventories.

39-2 - No significant paleontological resources have been found in the Arizona Strip District. Planning is in progress for an inventory to be conducted by U.S. Geological Survey. Once the inventory is completed, controls can be proposed.

41-1 - See Introduction to final EIS.

44-1 - See Introduction to final EIS.

- 45-1 - See Introduction to final EIS.
- 45-2 - Wilderness designation might adversely affect further exploration in these areas, but this is a value judgement that has to be made with the final decision.
- 46-1 - See Introduction to final EIS.
- 47-1 - See Introduction to final EIS.
- 67-1 - See response to comment 38-3.
- 67-2 - See comment 1-2.
- 67-3 - Regulations set forth by the Council on Environmental Quality indicate that the focus of description and analysis should be on the significance of "effects in the locale" in this type of Environmental Impact Statement. Flagstaff is not one of the cities within the BLM Arizona Strip District public land administrative region (40 CFR, 1508.27).
- 67-4 - See Introduction to final EIS.
- 67-5 - The comment refers to the report of the preliminary finding of wilderness characteristics for the primitive area and contiguous roadless areas in Utah. This report was published as Appendix 2 to the draft EIS and is not subject to environmental statement comment. The wilderness characteristics inventory proposal was published and a 30-day public comment period announced in the June 21, 1979 Federal Register. The Utah State Director's inventory decision was announced in the August 31, 1979 Federal Register. The inventory was the equivalent of an intensive inventory and conducted in accord with the intensive inventory procedures described in the Wilderness Inventory Handbook (OAD 78-61). Change 3 of Organic Act Directive 78-61 is dated July 12, 1979 and was issued to District Offices in Utah on August 7, 1979. The inventory was thus conducted before the initiation of the Change 3 policy.

The inventory was consistent with the Wilderness Inventory Handbook procedures. Use of these procedures was mandated by the September 20, 1978 Instant Study Area Review Policy (OAD 79-60). These procedures state that the area with wilderness characteristics must at least contain naturalness and one of the remaining two wilderness characteristics. Several comments stated that the maps of each characteristic were helpful to the public. To eliminate subjectivity, the report states that the standards for outstanding opportunities were determined by what the current visitors to the primitive area considered outstanding. Visitor register comments and observed use patterns were used to establish these standards. The maps on pages 87 and 88 show that outstanding opportunities were identified on the benchlands above the canyons.

- 95-1 - See Introduction to final EIS.

- 95-2 - Agreement, the human disturbance of wildlife species is well documented, especially for bighorn sheep. An increase in visitor use in the three identified areas would increase the frequency of wildlife-human encounters and thus negatively impact various species.
- 95-3 - If in fact the identified areas are designated wilderness, later mineral withdrawal would benefit the habitat as well as species. Likewise, restricting road building within these areas should reduce disturbance and habitat removal for numerous wildlife species, including mule deer. Wilderness designation perse does not ensure protection. The later restrictions on mining, road building, and range improvement projects would.
- 95-4 - The objective in limiting season of use or party size in Paria Canyon is to maintain the integrity of the canyon environment, not to restrict hunter access. Some limit on party size could be necessary if visitor use continues to increase. Season of use restrictions, however, are not anticipated in the near future.
- 95-5 - We agree. This suggestion will be incorporated.
- 95-6 - The heading will be changed to "State and Federal Threatened and Endangered Wildlife". This paragraph will be rewored to differentiate between State and Federal listed species as recommended. The Vermillion Cliffs-Paria Canyon complex were historically occupied by both the peregrine falcon and the desert bighorn sheep. A peregrine eyrie is suspected to be active in this area. Under BLM contract Mr. Dave Ellis analyzed potential peregrine habitat within the Arizona Strip in 1979. According to Ellis this area is prime peregrine nesting habitat. The inventory phase for the Paria Canyon-Kanab Creek Habitat Management Plan will begin in 1981. The featured species for these areas are bighorn sheep and mule deer. The decision to reestablish bighorn sheep will be determined through the HMP process jointly by AG & FD and BLM. BLM is committed to encourage the reestablishment of extirpated populations on public lands.
- 95-7 - Table 3-2 will be changed to "State and Federal Threatened and Endangered Wildlife".

The Arizona Strip District's policy on identifying State-listed species in an area is based solely on presence or absence. No judgement is made as to whether the species' habitat is crucial to its existence. The main reason to list these species even if they are only occasionally visitors is to document their presence and to ensure their consideration in the planning process. According to our information, population data does not exist for the snowy egret, black-crowned night heron, and black hawk.

95-8 - Change made in final EIS.

95-9 - Changes made in final EIS.

95-10 - We lack comprehensive visitor use data for the Paria Plateau due to it's remoteness and inaccessability. The 1975 figure, although below estimated present use, is the only actual yearly use data we have.

We question the yearly estimate of 200 visitor days for big-game hunting on the plateau. On opening weekend of the 1980 season, BLM crews documented only 18 visitor use days from Friday through Sunday night. Ranchers reported a decline in hunting pressure after that weekend.

Wilderness suitability does not depend on present or potential visitor use. Visitor use only supplements the wilderness qualities of size, naturalness, manageability, along with opportunities for solitude and primitive/unconfined recreation.

95-11 - Addition made in final EIS.

95-12 - Addition made in final EIS.

95-13 - Addition made in final EIS.

95-14 - The proper title of this section is "Animals". The second portion of this comment has been changed in the final EIS.

95-15 - Change has been made in final EIS.

95-16 - Change has been made in final EIS.

95-17 - Change has been made in final EIS.

95-18 - Change has been made in final EIS.

95-19- BLM acknowledges these comments and finds them valid. They will be used
22 - in further considerations but due to the difficulties of making the changes will not appear in the final EIS.

108-1 - The Navajo Land Act no longer affects the Paria Plateau as of July 1980.

The existence of the Glen Canyon National Recreation Area protects the natural integrity and provides trailhead facilities for the lower end of Paria Canyon.

108-2 - See final EIS and enclosed map.

108-3 - See final EIS.

109-1 - See final EIS and enclosed map.

109-2 - The National Park Service has identified 6,180 acres contiguous to Paria Canyon Primitive Area as having wilderness potential. At this writing, the proposal is being reviewed by the Director of the National Park Service before being sent to the Secretary of the Interior.

- 109-3 - The El Pequito Mine was mentioned only to show mineralization of the area. Even though it is not within the proposed designation of this report, it shows an analogous condition.
- 109-4 - Table 3-2 lists the peregrine falcon and razor-back sucker as being documented in Paria Canyon. The number of species are shown in the narrative section. The four songbirds were listed to emphasize the importance of nongame birds in general. The presence of mule deer was brought out in the Land Use section under recreation. The presence of beaver was overlooked and will be added.
- 109-5 - That these species are State and Federally listed denotes the importance of maintaining viable population levels.
- 109-6 - See the final EIS and enclosed map.

13200 E. 147th Ave
RECEIVED
BUREAU OF LAND MANAGEMENT
APR 28 11 18 AM '80
PHOENIX, ARIZONA
Deaver, Colo 80318
April 24, 1980

Arizona State Director
BLM
2400 Valley Bank Center
Phoenix, Arizona 85073

Dear Mr. Whitlock:

- 1-1 I wish to make a couple of comments
on the Arizona Strip Wilderness Draft:
Environmental Impact Statement and
Suitability report. First, and most
important, I strongly recommend Alternative
2 be adopted by your agency. I take
this position because the areas meet
the criteria set down by Congress.
1-2 Second, I wish to disagree with
your suggested environmental consequences
regarding increased uses and abuses
following, and the consequences of,
wilderness designation. On pages
1, 55, and 56, this notion is
put forward; on page 56 it is
noted that there would be increase(s)
visitor use as a result of widespread

1-2
cont.

publicity during decisionmaking".
I feel you may be overestimating
the possible effects. For in fact, publicity
on the BLM Inventory is little and
very low-key. A primary reason
for the low attendance at public
hearings is the poor publicity it is
given.

But I am not contending that
visitor use to the mentioned areas
will not increase; for it will.
However, as is noted on page 24 of
your report, visitor use has increased,
on the average, about 20-25% each
year for the last decade. This
increase was not due to wilderness
designation or publicity, and doubtless it
will continue with or without such
designation. My point is that you
fail to note that use will increase
due to increased public interest in
primitive recreation, and that this, I feel,
may be a more important factor in
visitor use than publicity or
wilderness designation itself. The land must
be preserved to permit average citizens increase in
public interest. Sincerely,

Joe McBlain

22 April 1980

Arizona State Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85073

REC
B.L.M. 47
APR 25 1980
PHOENIX

Dear Mr. Whitlock:

Thank you for sending me a copy of the Arizona Strip Wilderness Draft
Environmental Impact Statement and Suitability Report. I find the
ES and Report to be adequate and well done. This document is one
of the more concise environmental statements I have read recently.
The preparation team is to be congratulated.

- 2-1 I wish to express my support for Alternative 2 in the ES and Report.
I feel that this increased acreage is necessary to protect the
wilderness values against the ever-present, and growing, threat for
mineral exploitation. While never having hiked into the three
designated study areas, I have been in the vicinity several times
and the knowledge that wilderness characteristics they possess are
being maintained is very important to me. I plan to backpack
into the area someday and desire the pristine nature of the three
study areas to be maintained. Even if I should never get to enter
these areas, I would support Wilderness designation and protection
for this region.

Thank you.

David L. Schein

512 N. W. Ta
Mt. Prospect, Illinois 60056

REC
B.L.M. 47
APR 30 1980
PHOENIX

Allen R. Cockle
800 W. Calle Casquilla
Tucson, Arizona 85704
April 28, 1980

Arizona State Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85073

Dear Sir:

I have reviewed the Environmental Impact Statement and
Suitability Report for the areas known as the Arizona Strip Wilderness.

- 3-1 There is no question that the three areas described are
beautiful and have wilderness characteristics. However, the paradox
in legislating these areas as wilderness is that you will inhibit
mineral exploration and subsequent industrial development in the re-
maining part of the strip in order to "preserve" their naturalness.

- 3-2 For this reason I cannot support the draft recommendations #1
or #2. I urge, instead, that the proposed action #3 - "no action" be
chosen. Since you state in page 6 that "under no action the condition
of the study areas is not expected to change", I submit that no further
legislation is appropriate or necessary.

Sincerely,

Allen Cockle

4

53 Fort St. Paul
May 1, 1980 86001

Arizona State Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85073

Dear Sir:

I am writing in support of Alternative 2 in the inclusion of Paria Canyon Primitive Area, Vermilion Cliffs Natural Area and Pateute Primitive Area in the National Wilderness Preservation System. I support this for the following reasons:

1. There will be a potential increase to local employment and income.
2. Although wildlife, game & water resource development costs may increase, the maintenance of long term productivity of the three ecosystem complexes may serve to indirectly allow or lessen any possible negative economic impacts. Also, as stated in sec. 4, Arizona Strip Wilderness Draft, game and wildlife improvements may be allowed and maintained after consideration of their impact on wilderness character.
3. There will be no effect on existing air quality.
4. Wilderness designation will not affect current mining as none presently exists within the study areas.
5. Impact on water resources in most cases would not be adverse and may possibly improve.
6. Cultural and recreational resources may or may not be affected as ORV's could be banned from the areas (which receive low use presently) decreasing accessibility and ability to collect heavy or large quantities of specimens. Cultural sites would not be any more susceptible to vandalism than they are presently.
7. Wilderness values, will, however temporarily, be protected. This is a valuable resource that is irreplaceable, rapidly diminishing (especially in the southwest) and of much value beyond one of dollars and cents.

Sincerely,

Hester M. Kelly

6

R.D. 4
Canton, N.Y. 13617
April 28, 1980

RECEIVED
BLM AZ STATE OFFICE
MAY 2 9 48 AM '80
PHOENIX, ARIZONA

Arizona State Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85073

Dear Sir:

Thank you for sending me a copy of the Arizona Strip Wilderness Draft RIS and Suitability Report.

In the interests of brevity, I refrain from commenting on the specifics of individual areas and their proposed designation but I herewith indicate my reasons for proposing the designation of a maximum acreage to wilderness within your jurisdiction.

As indicated in the Draft RIS, an area designated as wilderness can be changed by the Congress if that is found advisable, but an area that has been designated non-wilderness and opened to exploitation, that exploitation may render the area unfit for wilderness forever, thereby precluding any change at a later time.

The fact that less than one percent of the United States is now classified as wilderness clearly indicates that this miniscule percentage is not representative of the wishes of the people or a fair and reasonable balance of land use demands correction by the designation of every remaining area that can qualify.

A third basic reason which is no less important, is the fact that these federal lands belong to all of the people of this nation, not just local residents, timber, mining, livestock and off-road vehicle, oil and gas interests. Equal consideration should be given to all citizens since each has equal rights.

The real danger of error lies in the failure to recommend all qualified areas for wilderness designation since that may be irrevocable while the opposite is correctible.

I appreciate the effort being expended by the BLM in taking action to outline areas that may be qualified to be included in the National Wilderness System.

Sincerely,

Clarence Petty
Clarence Petty

5



United States Department of the Interior

BUREAU OF MINES

BUILDING 20, DENVER FEDERAL CENTER
DENVER, COLORADO 80225

Intermountain Field Operations Center

April 29, 1980

Memorandum

To: Arizona State Director, Bureau of Land Management, 2400 Valley Bank Center, Phoenix, Arizona 85073

From: Acting Chief, Intermountain Field Operations Center

Subject: Review of the Arizona Strip Wilderness Draft Environmental Impact Statement and Suitability Report

The subject statement and suitability report, prepared by the Bureau of Land Management, Department of the Interior, was reviewed by personnel of the Intermountain Field Operations Center, Denver. The document proposes that the Paria Canyon Primitive Area, Vermilion Cliffs Natural Area, and Pateute Primitive Area be included in the National Wilderness Preservation System. The three areas would cover 112,742 acres of public land in Coconino and Mohave Counties, Ariz., and in Kane County, Utah.

The Bureau of Mines, in cooperation with the U.S. Geological Survey and the Bureau of Land Management, conducted a reconnaissance mineral survey in the three proposed areas. A report of the study will be published and placed on file in the Arizona Strip District office of the Bureau of Land Management.

- 5- Minerals found to occur in the study areas include copper, silver, lead, zinc, manganese, tungsten, arsenic, gypsum, and uranium. Although none of the deposits presently would support an economical mining operation, several occurrences have enough potential to warrant further exploration. Such areas should be considered in the final environmental statement.

Carl E. Starch

Carl E. Starch

7

JBS:smh
PO Box 532
Phx Az 85001

BLM, Az State Office
2400 Valley Bank Center
Phx Az 85073

RECEIVED
BLM AZ STATE
MAY 6 9 36
PHOENIX, ARIZ

P.1

Dear Director,

In the Suitability Report for the Arizona Strip Wilderness, Wilderness Suitability Recommendation, P.3, 2nd column, fourth paragraph, BLM recommends to Congress to authorize motorized vehicles to maintain pipelines. Neither the EIS nor the Suitability Report explains this recommendation. In the same paragraph the recommendation to recognize water rights is made. The implication is that the two are related, this is not clear. To recommend the use of motorized vehicles needs

P.2
to be well justified. Alternatives such as
the use of horses, should be evaluated
and the results presented in the EIS.
Only when found to be an extreme
hardship, justifying such use, should
vehicles be used. The maintenance
of pipelines (nowadays AC pipe) does
not usually require extreme methods or
techniques. A person on horseback can
do routine surveys and repairs. The
necessary materials and tools can be
carried in a saddle bag. Additional or
replacement pipe can be carried by
pack animal. Only when extreme ~~hardships~~

P.4
the customary methods. What is
the impact of alternative techniques?
Couldn't horses and hand labor be
used here also?

Thank you for this opportunity
to comment.

Joseph Burns Smith
Joseph Burns Smith
18021 N. 41st Street
Phoenix Az 85032

P.3
are required and the use of hand
labor would be a severe hardship
should vehicles be considered.

The following paragraph on P.4 is
confusing, is this a recommendation?

The subject matter of this paragraph
is presented on P.51 of the EIS
as an assumption in the proposed Action
and was never addressed as to whether
there is an alternative to developing
and maintaining appropriate wildlife
and grazing improvements thru

Cheryl Pfeiffer
131 Santa Cruz St.
Santa Cruz, California
95060
(408) 425 8227

8
JAN 5 1981

Arizona State Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85073

Dear Mr. Whitlock,

I am writing in response to the Arizona Strip Wilderness
Draft Report. First of all, I would like to comment on the impact
statement format. I feel this report is an excellent well rounded
account of alternatives for the Arizona Strip District, Mohave and
Coconino Counties, Arizona. Visual graphics and photos made the
impact statement enjoyable to read for all people.
The preservation of this area is extremely important for future
and enjoyment. I was most fortunate to be able to visit Paria Co
last fall. I was most impressed with the natural beauty and I re-
cognized it's special unique geological significance as being one
should be preserved and protected from human exploitation and
excessive use.

Extending the boundaries of the wilderness designation
(as in Alternative 2) is a viable solution to such human impact
such a small area as the Paria Canyon. The hiking and camping
experience in this area most undoubtedly will increase in usage.
 solitude and available opportunity will decrease if designation is re-
stricted to the now present proposed boundary sites.

I am an Environmental Studies student at the Univ. of
Calif. in Santa Cruz. My fundamental vocation in life is to do
what I can to protect such wilderness areas for the enjoyment of
not just present population, but future generations as well. Be

must realize the importance of these wilderness areas as a necessary part of human existence. When I am in a natural environment, such as Canyon, I can sense a direct contact with the natural systems that are the basis for human survival.

I am greatly smalled by the Public Attitude Analysis, stating that businessmen feel air quality restrictions might limit future industrial development and that "wilderness designation would increase tourism with out increasing financial benefits to local areas, since they feel backpackers are not big spenders." This attitude is the major crux of our social / economical / political / environmental problem. We can not continue to view our wilderness land in monetary terms. I feel business men, (and I am sure that all business people are not only men), need an environmental consciousness and incorporate this consciousness into their working philosophies; rather than the ever present economical dollar base, which is so prevalent among the business people in our society.

The reality and gravity of the environmental crisis can no longer be denied. What had been a somewhat remote controversy among specialists and the committed few over the limits of growth was brought home forcefully to the common person during the energy crisis of 1973-1974. Of course, both theory and common sense have always told us that infinite materials and population growth on a finite planet was impossible. There needs to be a place of limits for human activity so that the natural cyclic patterns can continue with out further human consequences. The cycle is fragile and with increase of human development on such a fragile system would mean a loss of balance with in the Paria-Plate area. I believe human limitations and restrictions on certain areas should not be considered to have a negative connotation, but the virtue of limits

(2)

is that they are part of the self-regulating process that leads to community homeostasis. With a new ecological understanding, we can see that linear, single-purpose exploitation of nature, is not in harmony with the laws of the biosphere and must be abandoned. Instead, we must learn to work with nature and to accept the basic ecological tradeoffs between protection and production, optimum and maximum, quality and quantity. This will necessarily require major changes in our life, for the essential message of ecology is limitation and this may be less than we desire. Let this change take place here and now! Let's hope business people and all people will incorporate basic concepts for human survival with their working philosophies; this means wilderness lands and the protection of such lands with limitations in usage.

This land have a value that surpasses any monetary based value. Instead of questioning the worth of this land, I feel we should all question our economical and political systems. If we do, then we shall realize that this land will never lesser in value in the future.

I do hope that the designated boundaries are extended, so that human impact is at a minimum and that more people can experience this beautiful and unique land in years to come, for the enjoyment of itself. Please inform me of any new proposals or additions to the present proposal concerning the Arizona Strip Wilderness area. If there is any need for my assistance please let me know.

Thank-you.

Cheryl L. Pfeiffer

(3)

9
BLM A
MAY 6 3 06 PM '80
PHUEI

343 Glenwood Avenue
Prescott, Arizona 86301
May 3, 1980

Arizona State Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85073

9-1
Dear Sir:-
I appreciate the effort that has gone into the Arizona Strip Wilderness draft statement that I received recently. After examining the Environmental Impact Statement and Suitability Report concerning the Arizona Strip Wilderness, I recommend Alternative 2 and hope that it will be adopted and adhered to. We must not allow the destruction of natural land resources, but preserve for future generations as much as we can of what past and present generations have enjoyed and we are now with danger to much destruction.

Respectfully yours,
C. H. H. H. H.

10

1270 W. Las Loimitas
Tucson, Arizona 85704
6 May 1980

ARIZONA STATE OFFICE	DATE
BUREAU OF LAND MANAGEMENT	FILE NO.
PHOENIX	PROJECT NO.
BY	DATE
FOR	DATE
TO	DATE
FROM	DATE
RE	DATE
BY	DATE
FOR	DATE
TO	DATE
FROM	DATE
RE	DATE

Mr. C. Whitlock
Arizona State Director
BUREAU OF LAND MANAGEMENT
2400 Valley Bank Center
Phoenix, Arizona 85073

Re: Arizona Strip Impact & Suitability Report

Greetings Mr. Whitlock:

This will acknowledge and thank you for the above mentioned report. It is certainly well done.

10-1 Due to the fact that I will be unable to attend any of the hearings, I wish to register my recommendations of combining alternatives one and two and adopting same as a single action for all three areas. If this is not possible, we should make some attempt to include the Coyote Butte area in some type of protective measure.

Sincerely,

Gene I. Wendt
Gene I. Wendt

CIV/mh

This is a comment on the E.I.S. I wish it moved in the housing record!

Page 22 on

I've just read your proposals for the Paria/Paria/Vermilion Cliffs areas. Since I haven't visited any of the area I can add nothing factual to your presentation.

11-1 I have I endorse Alternative #1 and will urge the organizations I am part of to be politically active in support of the option. The reasons for choosing #1 are actually obvious.

A) The use figures for the Paria may only be the tip of an iceberg. As development destroys more and more of the American Wilderness use pressure on outstanding existing areas will increase rapidly. I can attest, from experience with a recreation oriented population of young people that many folks instantly think Paria/Paria because of the high use and restrictive permit system of the Grand Canyon N.P. Therefore, the more area you have the more options for a first rate wilderness experience.

B) From the text and maps it would appear that the additional acreage will not impinge severely on any economic activity

over →

I do have a few questions.

- 11-2) You suggest that maintenance of stock ponds would be more difficult with a wilderness designation. Are you aware that much of the current RARE II legislation in the Congress contains special provision to allow ranchers to obtain permission for material maintenance of stock facilities. Do you actually advocate such provision for might? State some? of the grazing interest pressure against wilderness.
- 11-3) Are you beginning to work on a wilderness management plan for these areas? I feel that it is imperative to manage for culture in areas where major topographic feature is a narrow canyon corridor.

Thanks for your attention

John Rothney

JAKE ROTHNEY
PO Box 445
BOULDER, CO 80500
80306

RECEIVED
MAY 10 1980
MAY 10 1980
MAY 10 1980

12

STATE DIRECTOR
ALM
2400 VALLEY BANK CENTER
PHOENIX ARIZ 85073

12-1

Support wilderness status for the PARIA, PAUTE and VERMILION CLIFFS. All of the Vermilion Cliffs should be included as wilderness. Also a large effort should be made to maintain normal stream flow in the PARIA RIVER.

Sincerely
Michael Barry + LAURA CORBIN
4549 E 20th
TUCSON AZ 85711

RECEIVED
MAY 9 8 01 AM '80
MAY 9 8 01 AM '80

13



RECEIVED
MAY 9 1980
MAY 9 1980
MAY 9 1980

May 2, 1980

Division of
State History

Chairperson
Environmental Coordinating Committee
State Planning Office
118 State Capitol
Salt Lake City, Utah 84114

RE: Arizona Strip Wilderness Draft, Environmental Impact Stat. Multi Co.

Dear Chairperson:

In response to your request for review and in accordance with your responsibility as outlined in 36 CFR 800.4 we are happy to consult with you concerning your project.

The staff has determined, after review, that if the stated procedures, projects or regulations are followed as outlined, there will be no known effect upon any potential or listed National Register historic, archeological or cultural sites.

If you have any questions or concerns, please contact James L. Dykman, Compliance Administrator, or Wilson G. Martin, Preservation Development Coordinator, Utah State Historical Society, 307 West 200 South, Salt Lake City, Utah 84101. 533-6017.

Sincerely,

Melvin T. Smith

Melvin T. Smith
Director and
State Historic Preservation Officer

JLD:rel MIB M211

(3) Concur with findings/recommendations
cc: Arizona State Director, Bureau of Land Management, 2400 Valley Bank Center
Phoenix, Arizona, 85073

COCONINO COUNTY BOARD OF SUPERVISORS

COCONINO COUNTY COURTHOUSE SAN FRANCISCO AND BIRCH ST. PHOENIX, ARIZONA 85001

MAY 12 9 54 AM '80

PROCESSED BY LUNA

J. Dennis Smith
Chairman
District 1John R. Smith
County Manager
Ernest Utsumi
Clerk

May 7, 1980

Clair M. Whitlock
Arizona State Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85073

Dear Mr. Whitlock:

In response to the Draft Environmental Impact Statement and Suitability Report for the Proposed Wilderness Areas in the Arizona Strip District, Mohave and Coconino Counties, I would like to offer the following comments:

- 14-1 1. I have serious reservations about the impact a wilderness designation would have on existing ranching operations currently being conducted in the affected areas. The report points out that a wilderness designation would frustrate "... the implementation of proper livestock management," would inconvenience ranchers through restrictions being placed on the use of roads, and could force reductions in the number of livestock currently being maintained. The report concludes that, "Neither the proposed action nor the alternatives are expected to have significant economic impacts on livestock grazing. ..." I would suggest that based on the analysis contained in the report and as outlined above, this conclusion is simply not true.

If the wilderness designation is to be applied to these areas, perhaps some accommodation (or variance) could be granted to allow continuation of existing ranching or livestock grazing operations at their current level. As these operations are phased out by the ranchers themselves, then they could be restricted from reapplication.

- 14-2 2. In the analysis of the land use consequences, the report concludes that the proposed action "... would significantly affect neither the opportunity nor the quality of primitive values." Yet, on the same page (p. 55) the report also concludes that the wilderness designation would increase visitor use and "... might accelerate the decline of sightseeing values (and) graffiti and loss of pottery sherds or other artifacts would diminish the scenic, archaeological, and geologic sightseeing qualities." I find these two conclusions to be totally inconsistent. If the latter conclusion is correct (as I would suspect), then perhaps the wilderness designation should be reconsidered and no changes be made in the existing conditions or area designations.

1126 EASTON
U. of MD.
COLLEGE PARK, MD. 20742
April 27, 1980

15

Arizona State Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85073

Dear Sir,

- 15-1 I am writing in reference to the Arizona Strip Wilderness Area. Your proposed action, as well as your alternatives are all good ideas; though I feel Alternative 2 would be best for all involved. Enclosed, you will find my reasons for stating why alternative 2 should be implemented. Thank you for your time and consideration.

Sincerely,

John C. Nace

CLAIR M. WHITLOCK
May 7, 1980

Page Two....

14-3

3. The report notes that, in the Paria and Vermilion Cliffs area, features and conditions occur which are conducive to oil and gas accumulation and that "the known uranium mineralization in this area indicates that commercial deposits exist" (p. 16). In light of current national priorities with respect to energy sources, conservation and conservation, perhaps these conditions should be further investigated or explored before the area is designated as wilderness.

I thank you for the opportunity to at least respond in writing on this project and I trust that these comments will be given consideration.

Sincerely,

Dr. Peter J. Lindemann
Supervisor District No. 1
Coconino County

PJL:jmc

Alternative 2 allows for better over-

all management, because it designates more area as wilderness area than either the proposed action or alternative 1 do. With more management occurring on wilderness areas, though requiring more effort from the Bureau of Land Management, a better quality of land could be maintained. This would increase the recreation of the area, which might tend to have harmful effects on the land, could decrease the incidence of vandalism in the area due to more people, and thus a greater chance of getting caught. With the better management, sightseeing could remain excellent, due to the extra patrolling of the lands.

Though a wilderness designation would decrease the amount of mineral exploration, this would tend to keep sightseeing good. The less disturbance an area has, the better it will remain. Also, since water development in the area would be restricted, there would be even less disturbance than continuing with the present mode of operation. And, since Off Road Vehicles would be prohibited, air quality could remain good, as well as other environmental aspects. With O.R.V.s prohibited, the overall deterioration of the area would be slower than if they were allowed in.

Livestock grazing would not be inhibited by alternative 2, though more intensive

grazing would be inhibited, due to the restrictions on water development.

The general appearance of the area would be kept at its present status with the restrictions on development for industrial purposes that are imposed by the wilderness designation. Any other type of development would also be prohibited by the same designation, though.

The wilderness designation could be used to assist the endangered or threatened plants or animals in the area. With the extra management, many of the species could be removed from the endangered lists. The species would definitely benefit from the restrictions on ORV use, the reduced mineral collecting, as well as from the restrictions on development of the area.

Alternative 2 also has the benefits of an increased annual income. It has been projected that by the year 2000, the annual economic benefit would be \$128,400, as opposed to \$99,400 from either the proposed action or alternative 1. This extra money could be used for providing the extra necessary management required by the larger area of wilderness designation.

With these benefits, as stated here, I believe Alternative 2 should be implemented.

17

May 15, 1980

PE
BLM:JL
MAY 15 1
PHOENIX

Mr. Clair M. Whitlock
Arizona State Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85073

Dear Mr. Whitlock,

Let me commend the Arizona BLM for its thorough analysis and treatment of three distinctive wild areas of the Arizona Strip Country in its "Arizona Strip Wilderness Draft Environmental Impact Statement and Suitability Report". After reviewing the report I feel the proper alternative for future management of these areas is Alternative 2 (Contiguous Lands Alternative). The acreage lost to mineral exploration and development and the slight hardships imposed on grazing activity would be minimal in relation to the enhancement and protection of this important wilderness habitat. The white pine forest on Mt. Bangs, the sensitive and endangered plants in all three areas and the protection of important Peregrine Falcon nesting areas in the Piute and Paria areas is preeminent. I am in full support of the Contiguous Lands Alternative and urge its adoption in the final EIS. Thank you for your time.

Yours very truly,
Michael Burwell
Michael Burwell
P.O. Box 40967
Tucson, Arizona 85717

Arizona State Director
BLM
2400 Valley Bank Center
Phoenix, Arizona 85073

Dear Sir:

Please include my comments in the public hearing record for the Arizona Strip Wilderness Proposals.

16-1 I favor Alternative Two-inclusion of contiguous lands for wilderness designation. The positive findings by the bureau on naturalness criteria in these contiguous areas as well as personal knowledge of these areas prompts my comment. The increased number of visitor days as shown in table 3-4 of the EIS also supports larger areas-diffusing visitor pressure.

In addition, though not opposed to sale of lands to the Navajo Nation, I strongly oppose any sale of lands proposed as wilderness or covered in either alternative until final designations are made.

Sincerely,

James W. Tilley, Jr.
James W. Tilley, Jr. D.V.M.

18

IE INTERMOUNTAIN EXPLORATION COMPANY

P.O. Box 473
Boulder City, Nevada 89005
(702) 293-1098

May 15, 1980

Arizona State Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85073

Re: Arizona Strip Wilderness Draft

Dear Sir:

We have reviewed the draft report and recommend the alternative actions. We notice that our Sun Valley Mine and lands to the west are not included in the Wilderness recommendations, and concur that this is a wise decision. The mine and the lands to the west along the Vermillion Cliffs should not be included as they clearly lack the requisites for "wilderness".

Yours truly,

Richard V. Hyman
Richard V. Hyman
President

RVT:tag
cc: Cloud S-app
E.L.M., St. George

19

RECEIVED
BLM AZ STATE OFFICE

MAY 19 1980

7:45 A.M.
PHOENIX, ARIZONAState Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85073

May 17, 1980

To the BLM:

I attended the hearing at the draft suitability report for the Arizona Strip on May 6, but did not speak at that time. I would like to state that the report seems generally fair and well balanced. The only comment I would make is to urge you to include as many designated wilderness as possible on the Paria Plateau, including Coyote Buttes, to insure that the Paria Canyon will remain in a balanced setting, protected from above, rather than a wilderness slot through lands assigned to other uses.

I would like this statement included in your hearing record.

Sincerely,

Frank Berger
Frank Berger
775 McCormick
Paradise Valley, Arizona 85253

A-95
State Coordinator
533-4871Environmental
Coordinating
Committee
533-5794Human Resources
Coordinating
Committee
533-4881A-95
Future State
Coordinator
533-6083Future Resources
Information
Center
533-4883

20

STATE OF UTAH

Scott M. Matheson
GovernorKurt B. Biggs
State Planning CoordinatorDivision of Policy and Planning Coordination
Interagency Planning Section
Lawrence Tompkins, Associate State Planning Coordinator
124 State Center
Salt Lake City, Utah 84111
533-4881

May 16, 1980

Arizona State Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85073SUBJECT: Arizona Strip Wilderness Draft EIS and Suitability
Report (SAJ #79C326028)

Dear Sir:

The Utah State Environmental Coordinating Committee has reviewed the information in the Draft EIS, Arizona Strip Wilderness and Suitability Report. The Committee has found no discrepancy with existing Utah state plans and objectives and feel the information will be helpful in future planning.

The only agency choosing to comment at this time is the Division of State History; these are enclosed for your information.

Thank you for the opportunity to review and comment on this material.

Sincerely,

*Lee M. Allen*Lee M. Allen
A-95 CoordinatorLMA:be
Enclosure

Mr. Tolson	
Mr. DeLoach	
Mr. Mohr	
Mr. Bishop	
Mr. Casper	
Mr. Callahan	
Mr. Conrad	
Mr. Felt	
Mr. Gale	
Mr. Rosen	
Mr. Sullivan	
Mr. Tavel	
Mr. Trotter	
Tele. Room	
Mr. Holmes	
Miss Gandy	

21

Gentle (no) men:

In regard to the Draft Environmental Statement and Wilderness Suitability Report on the Paria Plateau, Paria Point, and Vermilion Cliffs National Areas, I would like to make the following comments.

I strongly support wilderness recommendations for all three of these expansive areas, including all of the Vermilion Cliffs, not just the eastern portion.

Good work for your propriety in including the Coyote Buttes area, which is getting rather unknown but quite fine & really unique. Perhaps I would encourage you to also include all of the Intensive Inventory Unit 1-8 (of which I'm personally rather fond) in the wilderness proposal.

Even though I once had to abandon a trip through the Paria Canyon because of high water, I want to emphasize the importance of maintaining the natural area. BLM AZ STATE OFFICE

MAY 22 1980

7:45 A.M.
PHOENIX, ARIZONARespectfully,
*Allen**Alan Seeger*

P.O. 74

G. Star, Az 85603

Advisory
Council On
Historic
Preservation

22

This response does not constitute
Council comment pursuant to
Section 106 of the National Historic
Preservation Act, nor Section 2261
of Executive Order 11593.1522 K Street, NW
Washington, DC 20005Room 111
14 Union Boulevard
Lake Placid, NY 13928

May 20, 1980

Arizona State Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85073

Dear Sir:

On April 24, 1980, the Council received your request for review and comments regarding the draft environmental statement (DES) for the proposed wilderness areas in the Arizona Strip District, Mohave and Coconino Counties, Arizona. Having reviewed the document pursuant to its responsibilities under Section 102(2)(c) of the National Environmental Policy Act of 1969, the Council has determined that the DES is inadequate regarding our area of expertise because it does not demonstrate compliance with Executive Order 11593, nor Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. Sec. 470f, as amended, 90 Stat. 1370) as implemented through the Council's regulations, "Protection of Historic and Cultural Properties" (36 CFR Part 800).

Our major concern focuses upon the lack of a consistent and long-range plan to avoid or mitigate adverse effects to cultural properties that have yet to be adequately identified and that are eligible for inclusion in the National Register of Historic Places (National Register). This is particularly applicable to cultural properties located within an area designated as a "wilderness." It is also pertinent to the protection of such properties from adverse impacts caused by both human and natural actions. For example, there does not appear to be an established procedure that could be followed in the event that a wildfire threatened cultural properties. The situation may be that the Bureau finds it in the best public interest to allow such a fire to burn unchecked in certain areas. In another area, because significant standing historic cultural properties would be threatened, the Bureau would be required to fight the fire to prevent the destruction of such properties. Furthermore, there should be a mechanism to permit appropriate scientific research and provisions for applicable measures to stabilize or otherwise protect significant cultural properties.

Prior to any irreversible commitments or actions that could result in

Mr. Tolson	
Mr. DeLoach	
Mr. Mohr	
Mr. Bishop	
Mr. Casper	
Mr. Callahan	
Mr. Conrad	
Mr. Felt	
Mr. Gale	
Mr. Rosen	
Mr. Sullivan	
Mr. Tavel	
Mr. Trotter	
Tele. Room	
Mr. Holmes	
Miss Gandy	

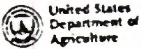
adverse impacts to cultural properties, the Bureau is required to afford the public an opportunity to comment on the proposed undertaking pursuant to Section 106. The final environmental statement should include evidence of consultation with the Arizona State Historic Preservation Officer, Mr. James [redacted] and evidence of compliance with Section 106. Until the requirements of Section 106 are met, the Council must consider the DES to be incomplete in its treatment of cultural properties.

Should you have any questions or require further assistance, please contact Charles M. Niquette of the Council staff, telephone number (303)234-4946, an FTS number.

Sincerely,

Louis S. Wall
Louis S. Wall
Chief, Western Division
of Project Review

24



Soil
Conservation
Service

4012 Federal Building
125 South State Street
Salt Lake City, UT 84138

May 23, 1980

ARIZONA STATE DIRECTOR BUREAU OF LAND MANAGEMENT PHOENIX, ARIZONA	
MAY 27 '80	
TO:	ASD/BLM
FROM:	SCS
SUBJECT:	DES
RE:	DES
DATE:	5/27/80
BY:	SCS
CC:	ASD/BLM
FILE:	DES

Arizona State Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85073

Dear Sir:

The Draft Environmental Impact Statement and Sustainability Report for the proposed wilderness areas in the Arizona Strip District, Mohave and Coconino Counties, Arizona, has been referred to us for review and comment. The areas where SCS has interest and/or expertise have been adequately addressed. We have no specific comments.

Sincerely,

John H. McMillan
GEORGE D. McMILLAN
State Conservationist

cc:
Administrator, SCS, USDA, Washington, D.C. 20013

23
MAY 23 6 43 PM '80
PHOENIX, ARIZ

May 9, 1980

Dear Sirs

23-1

I am opposed to the inclusion of the Paria Canyon
Primitive Area, Vermillion Cliffs Natural Area, and Panguitch Primitive
Area in the National Wilderness Preservation System.

Extremely Angry

James R. Angrey
James R. Angrey

4501 E. Roma
Phoenix, Arizona

85C18

25

MAY 9, 1980

Dear Sirs

25-1

I am opposed to the inclusion of the Paria Canyon
Primitive Area, Vermillion Cliffs Natural Area, and Panguitch Primitive
Area in the National Wilderness Preservation System.

Extremely Angry

Jack R. Angrey
Jack R. Angrey

26

MAY 9, 1980

Dear Sirs

26-1

I am opposed to the inclusion of the Paria Canyon
Primitive Area, Vermillion Cliffs Natural Area, and Panguitch Primitive
Area in the National Wilderness Preservation System.

Extremely Angry

ARIZONA STATE DIRECTOR BUREAU OF LAND MANAGEMENT PHOENIX, ARIZONA	
MAY 28 '80	
TO:	ASD/BLM
FROM:	SCS
SUBJECT:	DES
RE:	DES
DATE:	5/28/80
BY:	SCS
CC:	ASD/BLM
FILE:	DES

Calvin
Calvin

27

Cynthia Riley
4028 E Desert La
Mesa, Az 85204

Arizona State Director
Bureau of Land Management
Valley Bank Center
Phoenix, AZ 85073

Gentlemen:

I have read your Draft Environmental Statement and Wilderness Suitability Report for the Paria Primitive Area, Paiute Primitive Area, and the Vermillion Cliffs Natural Area with a great deal of interest. All three are spectacularly beautiful areas with truly outstanding opportunities for recreation and solitude.

I strongly support wilderness recommendation for all three of these areas. The BLM has done an excellent job in compiling their report - I especially commend you for including the Coyote Buttes area in the wilderness proposal.

27-1

I would urge you to recommend all of the Vermillion Cliffs Natural Area as wilderness, instead of just the western portion, as you have done in the Draft Environmental Statement. I also support the inclusion of all of Intensive Inventory Unit 1-8 in the wilderness proposal. I believe that it is important that the BLM study adjacent areas to all three of these areas as soon as feasible for possible expansion of the areas designated as wilderness.

Another area of particular importance is the vital need for maintaining the normal stream flow and flash flood cycle in the Paria River. There is

a great need to protect the river's flow because it is this flow which has created the spectacularly beautiful Paria Canyon and continuation of this flow is necessary to the survival of the canyon.
Overall, I would like to commend the BLM for a job well done, and would like to receive any future information generated by the agency in regard to the proposals for these three marvelous areas.

Cordially,

Cynthia Riley
Cynthia Riley

28 70 Box 1155
Grand Canyon, AZ
May 27, 1980 86023

Dear BLM:

Please send a copy of the draft EIS on the Paria, Paiute, and Vermillion Cliffs areas in the Arizona Strip.

ARIZONA STATE DIRECTOR
BUREAU OF LAND MANAGEMENT
BY FILE
MAY 29 1980

28-1

I support wilderness recommendation for these areas, including the entire ~~the~~ Vermillion Cliffs section.

A normal stream flow and maintenance of flash flood cycles in Paria are essential to preserving the ecology of the area.

Please notify if any deadline has been set for public comment. Sincerely,
D. Behrels

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MAY 28, 1980
2235 E. Hampton
Tucson, AZ 85719

Mr. C. M. Whitlock, Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix, AZ 85073

Dear Mr. Whitlock:

29-1

Thank you for sending me a copy of "Arizona Strip Wilderness", a draft. This is nicely prepared and documented. I have studied it and I have the following reactions. I would very much like to support the wilderness designations for the Paiute and Paria Canyon primitive areas. I also would like to support the full wilderness designation for all of the Vermillion Cliffs similarly; for the Coyote Buttes and the Paria area I believe it is important to include the largest possible area. Now is the time to protect these areas for the future and for our children.

This last remark is for our family. Literally true because our children have hiked the various areas of your study and it has made an unforgettable impression on them. They in turn will encourage their children to become familiar with these beautiful wild lands in northern Arizona.

Thank you very much for your help in preserving this heritage.

Sincerely yours,

D. Behrels
D. Behrels

30



United States
Department of
Agriculture

Soil
Conservation
Service

3008 Federal Building
230 North First Avenue
Phoenix, Arizona

May 28, 1980

Clair Whitlock, Director
Bureau of Land Management - Arizona
2400 Valley Bank Center
Phoenix, Arizona 85073

Dear Clair:

We have reviewed the draft of the Arizona Strip Wilderness EIS and
Suitability Report.

The document is well done, easy to read and concise. Thank you for
asking SCS to review it.

Sincerely

Richard L. Johnson Acting
Thomas G. Rockenbaugh
State Conservationist

cc: Nora Berg, Chief, SCS
Chuck Lemon, Director, WTSC

3008 Federal Building
230 North First Avenue
Phoenix, Arizona

May 29 80

3008 Federal Building
230 North First Avenue
Phoenix, Arizona

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P.R. 2 Box 480
Lidena, Az. 86336
5-31-80

Mr. Clair M. Whitlock
Director Arizona State Office
Bureau of Land Management
2400 Valley Bank Center
Phoenix Az. 85073

Dear Mr. Whitlock,

Would you please mail me a copy
of the Wilderness draft Environmental
Impact Statement and Suitability Report
on the Arizona Strip country.

I have lived and worked in this area
many times and I am very familiar
with the area.

I also protested against allowing the
Navajo to acquire House Rock Valley.

Thanking you in advance for
the mailing of a reply

Sincerely yours
Lillian Kolzig

RECEIVED
BLM, AZ STATE OFFICE

JUN 3 1980

745 AM
PHOENIX, ARIZONA

32



COMMENTS ON THE ARIZONA WILDERNESS DRAFT. E.I.S. for Paria, Pinalte & Vermilion.

32-1

In the Arizona Strip Wilderness draft statement there is a very crucial
statement that I'd like to quote; "... once visitor carrying capacities are
reached in the proposed Paria Canyon and Pinalte Wilderness Areas, naturalness
and the opportunity for solitude could diminish."

This statement infers that if the 2 areas were not made into Wilderness
then some magical process would occur in which there couldn't be any increase
in visitor use of the areas. But it is never explained just how this would
come about.

I brought up this blatant statement since it is so characteristic of the
entire E.I.S. The entire Draft is biased. The people who wrote this report
are trying to make it look like objective discussion yet it is obvious that
they are making a justification that the 3 Areas should not be made into
Wilderness.

32-2

The very title of the Statement is "Arizona Strip Wilderness Draft" and
although the report we see the word "Arizona" mentioned. Yet the Public Hear-
ing Schedule has 3 Hearings in Utah and only one in Phoenix. We have worked
to remedy this blatant over-sight. It is obvious that the BLM planned to let
the people of Utah make more determination about these 3 Areas than the people
of Arizona. This is not just accidental either. It is again a blatant piece
of bias, prejudice in the extreme and another instance of the inability of
certain people to get over the archaic notion of a particular sense of
"Manifest Destiny".

This over-rides on a violation of our civil rights in that in essence
we are being denied a voice in determining what occurs in our own County
and State.

Now this brings us to exactly what is involved in making the final de-
cision of whether these 3 Areas become Wilderness or not.

All of this "Environmental Feasibility", such as geology, plants, animals and
etc is very nice, as far as some people, myself included, it is very perti-
nent. But, lets face it and not try and fool anyone, the animals, plants or
geology have no vote, no voice nor agency involved in this matter and that
that still makes the final determination.

On page 25, under the heading of "economic Conditions" there is mentioned
"Population, Employment, and Income". The only data is presented for 1977
and 1978, and it shows 55% of the population were employed in the service
and retail trade sector, not in farming or ranching. The next most import-
ant point that has to be brought out is that the "next most important source
of earnings was the government sector, providing 24% of the EIA's income."

6/1/80

page 2

32-3
cont

Yet on the same page we find the statement that the "residents of the
EIA intensely oppose Federal agency regulations, including the BLM proposal
and its alternatives to designate Paria and Pinalte Primitive Areas and Ver-
million Cliffs Natural Area as Wilderness." It appears that the EIA is in
Utah altho it doesn't specifically state such.

According to the report then these people rely heavily on government
funds, but they don't go along with the regulations. If the above statement
includes some of these government employees, then they are not doing the job
the agency that the Congress set for these very agencies to perform. If this
occurred in the private sector of business these employees could be fired.

32-4

I see that there was a social scientist in the area and his or her's work
is important in understanding any presentation of a planned report while seem-
ingly doing an adequate performance as required by law.

In the section on page 29 with the subtitle, "Social Traditions" we find
the statement that says "Historically, southern Utah and northern Arizona
communities have been culturally homogeneous. The values of this cultural
homogeneity stress small town virtues of neighborliness, friendliness and
mutual self help and emphasize close family ties, family pride, economic
independence, local autonomy and a strong religious life."

The social scientist goes on to say that in the past couple of decades
events have created pressures to undermine this cultural homogeneity. The
pressures are coming from the outside. They feel that the Federal Bureau-
cracy is increasing control over the community life. He says that these people
live with bitterness environmental protection policies affecting potential
coal development; power generation, and have stopped industrial growth.

Now, lets look all of this over very carefully because I'm convinced
that the right here in this particular section that I've quoted that the de-
cision upon these 3 areas has already been pre-determined by the E.I.S.

The social scientist tells us that the communities of southern Utah
and northern Arizona have been "culturally homogeneous". That's very interest-
ing since in northern Arizona, we have Pinalte, Navajo and Hopi peoples, plus
various ethnic groups in the towns like Flagstaff, where there is a high per-
centage of people with Hispanic names.

It's obvious that he really meant southern Utah, not northern Arizona.
Why this over-sight because the people of Coconino County were ignored,
they don't count and seems that they are segregated from the homogeneity.

The first cultural group of the Arizona Strip was historically homo-
geneous, they were all Pinalte. This fact was also over-looked too. Plus the
fact that their descendants are still living in the area.

particular activity in order to have a "wilderness experience". Some activities might enhance an experience for some which would ruin it for others (seeing a lightning storm for example). Being in a canyon such as Paria would probably be interesting for someone looking for long views and the feeling of wide open space around him. Often parties will deliberately avoid each other out of respect for mutual privacy, when possible. This is difficult if not impossible in the narrow confines of say Buckskin Gulch. This is not stated to berate the many qualities of Paria Canyon or Buckskin Gulch, but rather to emphasize the often overlooked qualities of the open slickrock and sand such as can be found in the higher country above these canyons. While recreational opportunities in the canyons may be limited by cold winter weather, high water, or flash flood danger, it is just at such times that recreational opportunities on the plateau may be at their greatest. Waterpockets are often filled to capacity during such seasons. There may even be an opportunity to cross-country ski as during the winter of '78-'79. The vast spaces of the Paria Plateau, Coyote Buttes, Clark Bench, Cedar Mt., etc. provide for badly needed dispersal of wilderness users not possible within the lower canyons. It is not due to a lack of outstanding wilderness character that these areas are presently little visited (indeed those wilderness users who have visited these areas are quite impressed by this character), but due to the fact that until the BLM Wilderness Review Process was started there was virtually no emphasis placed on these areas. Emphasis was entirely on the lower canyons. Placement of those portions of the plateau country recommended in this report into Wilderness Area status would do much towards relieving what is gradually becoming a chronic problem of over crowding within the canyons. Despite this recommendation we still strongly urge that a quota system be established for the Paria Canyon and Buckskin Gulch where overnight use is concerned, and that fires be limited to specific sites allowed only during the colder seasons in these canyons.

Rock Valley), as well as the bald eagle and peregrine falcon. Lack of ORV disturbance and a general preservation of habitat within the proposed Wilderness Area are highly desirable in order that these species may survive. (It is important to note that large areas of the Paria Plateau, Clark Bench, and Cedar Mt. will still be accessible to the general public by motor vehicle. Access to within a short distance of the Paria Canyon and Vermillion Cliffs rims would occur in some places for those desiring such views.)

It is also recommended that it be part of the law creating this Wilderness Area that those permittees holding grazing allotments within the Wilderness be allowed motor vehicle access to their allotments within the Wilderness Area for the purpose of repairs, tending cattle, etc.. Access should be allowed only upon notification of the BLM by telephone, mail, or other convenient means. Permittees should state within the notification; the date or dates a vehicle will be used within the Wilderness Area; the location of such use; the job or purpose (fence repair, tank inspection, etc.); and a description of the vehicles to be used. Access should be limited to existing ways whenever possible. The intent of this recommendation is to encourage the continuation of rural lifestyles essentially in harmony with the land as opposed to those which are not. As long as the local ranchers are not confronted with complicated forms and/or regulations in order to have vehicle access to allotments within the Wilderness Area, such designation should have little if any impact on those lifestyles. Likewise occasional use of motor vehicles within the Wilderness Area by permittees should have little impact on the wilderness qualities there.

Not much is apparently known concerning the importance of the proposed Wilderness Area to traditional Native American lifestyles and beliefs. The area undoubtedly has importance to the Paiute People and probable other Native Americans. Wilderness Area designation would protect sacred areas and important species of plants and animals used through traditional lifestyles.

Little has been said in this report concerning the scientific resources that will be protected and preserved by Wilderness designation for these areas. Lack of vehicular access to places within the proposed Wilderness Area will have a significant effect towards protecting biological, paleontological, and archeological resources existing there. ORV usage by even the most informed individuals (not generally the case) would still result in running over eggs, pits, pottery, etc. which cannot easily be seen from typically high profile vehicles, were it not for Wilderness protection. Lack of vehicular access to these areas will prevent both intentional as well as accidental damage to these resources. Needless to say a backpacker is not likely to have the energy (even if one had the will) to carry something like a metate (grindstone) or a panel of rock art back to their car. On the other hand with vehicular access, one can drive to where a desired item is, pick it up and drive away. It is of course no problem to bring heavy digging tools in a vehicle, ridiculous to carry them on your back. While increased visitor use resulting from Wilderness Area designation may be somewhat of a threat to archeological resources, access by ORV has already resulted in a serious loss of some archeological resources in the area. Likewise, ORV usage has had a detrimental effect on some plant communities. Select cutting for live piñon on the West side of Cedar Mt. is threatening to eliminate these trees from above the Paria Canyon rim in many places. Lack of ORV access would prevent this from happening in this area. Due to an unusual combination of soil and climate, interesting plant associations (piñon, buffelberry, and turpentine bush for example) can be found. These unusual plant communities will be protected as well as several Threatened and Endangered Species known to exist in the area or nearby. The Draft Environmental Impact Statement for the Navajo Land Selection mentions eleven plants which are rare and endangered (pp.59-60), and three animals (pp.80-81) of similar status. Among these are the cactus, *Padinocactus brevdi* (Known only to exist in House

In summary, it must be restated that the area discussed in this recommendation represents a unique set of cultural, scientific, recreational, and spiritual qualities and values. This recommendation is intended to preserve those qualities and values. The proposed Paria Wilderness Area is a fusion of cliff, canyon, and plateau; a blend of climate, culture, and biology; a masterpiece of color, form, and texture which under Wilderness protection should only get better with age.

Submitted by
Dwain Linder

On pages #22 and #23, there are statements which I quote: "Having been used by the Paiutes, the primitive area also has a potential for sacred sites, plants and animals." However, apparently these people were not contacted in order to verify that statement. I doubt if it would have been difficult to have checked on these "potentials".

But, since the ELM social scientist recognizes only one cultural group as being in existence then it is obvious that all the adjectives mentioned by him prevail only within one single racial and religious entity. And it is apparent in this report that they want this particular group alone to make the decision upon these 3 areas.

Just how he would define the reasoning behind the infamous Mountain Meadow Massacre was being inside the realm he describes as "neighboring and friendly" would be very interesting.

The desire for industrial growth, with coal mines and power plants makes the idea of economic independence very questionable. The corporations involved in this industrial growth would definitely be "Outsiders", and they could bring in even more "Outsiders". Check out the "Outsiders" Salt River Project brought into Page to be used labor so that the local Navajo could be laid off. This has just happened in the last month or so.

This would doom the cultural homogeneity far more and faster and more completely than the making of these areas into Wilderness.

I would recommend that the social scientist talk to the Navajo about what happened to their quiet peaceful traditional life when Glen Canyon Dam was built with the accompanying town of Page and the power plant. Also, go ask the residents of Black Mesa what happened to their lives when the coal mines opened up?

If the people of the ESA think that Federal Bureaucracy is increasing the pressures upon their lives do they really think it'll be less by not having Wilderness and having industrial growth? Just wait until they feel the impact of a real racial and religious mixture that growth can bring them? They'll love the United Mine Workers and the Teamsters Unions along with everything else. I'm willing to bet they'd be the first to seek some solitude inside the Wilderness areas. They'll retract their idea that population growth is beneficial. Those of us in Arizona can tell them about the area called Phoenix -- try Los Angeles!

32-6

I believe I've shot some holes in this Impact Statement in regards to some aspects of it. In section 5, page 61, under the title called "Consultation and Coordination" we do not find any information concerning Coconino County whatsoever. It apparently doesn't exist. And 2 of these 3 areas under consideration are in Coconino County.

and Moenopi take precedence over Page. To put it in perspective, Page is so new that the paint is barely dry on the buildings. And it's a product created by the Federal Bureaucracy.

Tuba City and Moenopi combined are older and have many Traditional families whose ancestors go back much farther than those from the Mayflower.

On the basis that I've presented here I can humbly say that this EIS leaves alot to be corrected. It points up that it was put together to please one small segment of the population, and I doubt that it was for the people of Arizona.

32-8

In closing I feel that to the best interest of the citizens of Arizona and Coconino County that all 3 areas be accepted, under Alternative #2 for Paria Canyon, Painted Mountain and Vermillion Cliffs. But that even that plan is insufficient in that the areas are too small. There could also be some changes made to benefit the livestock permittees to have better access to their particular grazing Unit. But excess only for the Permittee and for purposes related to his livestock only, - no dude wrangling.

Prior to a final draft I feel that this EIS needs a lot more work and correct the "rubber stamp" position it has so obviously demonstrated. ELM best learn that the people of Coconino County resent this thinly concealed attempt to take any decision on these areas away from them and to give it to another State.

Wm Beaver
Elmer Mountain Trading Post
Tuba City Rte
Flagstaff Az 86001

Why is Coconino County left out? No mention is made of any city in this county either. Under the sub-title "Other Organizations" we do not find the Museum of Northern Arizona or even the University.

Again I ask, is this purely accidental? I sincerely doubt it since it fits in with the other bias I've discussed before.

Much of what we've heard and read in opposition to this Wilderness remains as of another set of Public Hearings we have just recently had in Coconino County. I'm referring to those in regards to saving the San Francisco Peaks from desecration.

During those Hearings the Navajo and Hopi people spoke out against development because it was against their religious and traditional life styles. They were challenged by a group of what could be called "Outsiders" And we have been informed that the "Outsiders" has as such rights as the local people. To such a point that it seems it'll go all the way to Washington D.C. upon the appeals of both groups. So we know that the "Outsiders" apparently have rights too. We have been informed that if it is ruled in favor of the Native American people then we will be taken to Court on the basis that it is un-Constitutional for the Government to favor one religious group over another! It is an interesting aside that the very man who caused this particular controversy is from Utah.

It will be interesting to keep both of these Hearings in mind just to see how converted things could get in respect to their final decisions.

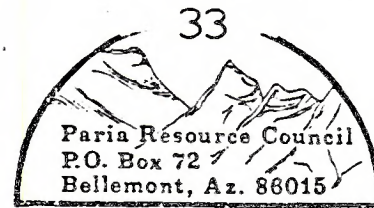
32-7

On page #31 we find one short paragraph about "Outside Interests". After reading it several times I'm still wondering exactly what it says? Perhaps a couple of statements from page 29 will help clarify this situation. I quote the first 2 sentences: "Two population groups have strong feelings toward Wilderness designation in the Arizona Strip: local residents and outside interests. To determine local attitudes, a ELM social scientist interviewed 32 residents of the EMA, representing a range of ages and occupations; locally elected officials; County Commissioners and members of City Councils. Exactly who these represented was never presented. But they are not identified as being from Coconino County.

If there are only 2 groups then why wasn't there more information presented on the "Outsiders". I'm wondering if people from Coconino County are considered as "Outsiders"?

At this point I'd like to digress a bit in order to strengthen a factor in this case. It is the matter of the cities in this area. Usually Flagstaff is one of the most mentioned cities in Northern Arizona, that's because it is the largest and is a County Seat. Next for the county we next hear about the city of Page.

Using the criteria as set forth in this EIS statement then Tuba City



A RECOMMENDATION FOR A PARIAS WILDERNESS AREA

The following is a recommendation for a Paria Wilderness Area located immediately north of Lee's Ferry in Coconino Co. Arizona and Kane Co. Utah. The recommended Wilderness Area totals approximately 131,000 Acres.

This recommendation has been prepared by a variety of concerned citizens who in the preparation of this recommendation have spent a great deal of time looking at one or more of the areas described below. It is believed that this area is particularly unique in having an enormous variety of topography, biology, scenery and recreational opportunity. Currently this area offers a very outstanding opportunity for solitude throughout most of it; these assets can best be protected by Wilderness designation. To facilitate description of the area and to clarify reasoning for this recommendation, the proposed Wilderness Area is subdivided into seven subareas, each characterized by a particular geography setting it apart from the others. The enclosed maps and photos show the proposed Paria Wilderness boundaries and the subareas herein described.

PARIAS CANYON (subarea #1)

This canyon, carved by the Paria River, is perhaps the focal point of all the surrounding wild country (though it may be equally argued that the Paria Plateau which the canyon is cut into is really the defining landform). If one begins at the head of the canyon just south of U.S. Hwy. #89, one first passes through a wide canyon with easy views of the convoluted slickrock forms above the rim. Along one wall are some interesting petroglyphs. A few miles into the canyon one enters the famous "narrows" of the Paria. For many miles hence the canyon gets deeper and deeper while remaining only 20-50 feet wide. The rust continually washes in the river while passing through this deep dark

corridor. Seep springs and their associated mineral salt precipitates are common. Hanging gardens of ferns, mosses, and other plants are commonly associated with these seeps. The wet sand and mud provide an interesting display of animal tracks and water patterns. Logs on high ledges give convincing testimony to the floods that race through here seasonally. Eventually the canyon widens somewhat though it is still quite deep with walls over 1,000' high. This part of the canyon is an excellent example of entrenched meanders created by the sudden uplifting of the Paria Plateau. At one point such a meander has been cut off leaving a well known rimson hanging high above the stream. A rich riparian habitat exists here which continues to Lee's Ferry. In a side canyon is 200' high Weather Arch, unknown until the 1950's. At one point the canyon is nearly 2,000' deep. Many rocky gullies provide interesting scrambles to ledges and benches giving a different perspective to the canyon. There are several large pinnacles and buttresses as well as hundreds of long fissures and crack lines. While a few of these have been climbed on rare occasions, the area is wide open in terms of new climbing routes of a wide variety. The Paria river is also occasionally floated during high water, and though there are some portages around boulders, this float must certainly be unique. About nine miles from Lee's Ferry the canyon suddenly widens. Fossil mud cracks and ripple marks are well preserved in the siltstones of the Chinle Formation. Petrified wood is also quite common. A large sand dune reaches halfway out of the canyon here. This dune was apparently created by sand blowing off of the Paria Plateau. Some excellent petroglyphs can be seen on some large boulders in this area. Potsherds and flint chips can also be found. The contrast of desert and riparian vegetation provide a contrasting double world to explore for the amateur and professional botanist. Some of the animals which exist here include: deer, fox, bobcat, herons, golden eagles, chuckwalla lizards and the ever present canyon wren. The only disappointing part of a trip into this canyon is the end.

slickrock slope dropping away from the rim of Paria Canyon. This extremely pristine and desolate country is a ragged maze of slickrock domes, benches, basins and crags. This is waterpocket country inhabited by deer, coyote, bobcat, hawks, and golden eagles. Called Thousand Pockets on the maps, this is possibly the area referred to by John Wesley Powell as Thousand Wells. Some of the waterpockets hold thousands of gallons of water. Ancient reptile tracks of at least two species can be found in the white Navajo Sandstone as well as ripple marks and weird concretions (fossils?). Rock windows and at least one small arch can be found in this area. Outstanding vistas of the Perry Swale, Echo Peaks, and Marble Canyon can be viewed here. About five miles from Lee's Ferry on this rim is a route down into the Paria Canyon. Another route exist at Lee's Ferry which is sometimes used by hikers to get to the Perry Swale. Perry Swale is a broad, rockwalled, U-shaped valley which was once a meander of the Colorado river but is now perched several hundred feet above Glen Canyon. Excellent views of Glen Canyon can be had from this area. The open spaces of Cedar Mt., the rugged maze of Thousand Pockets, massive escarpment to the NE, and the grassy Perry Swale offer an ever changing landscape with breathtaking overlooks into Paria and Glen Canyons as well as broad vistas throughout Southern Utah and Northern Arizona.

Buckskin Gulch (subarea #3)

Buckskin Gulch can be entered by either Wire Pass or Kaibab Gulch at the upper end. If entering via Kaibab Gulch one follows a winding wash through slickrock domes. To the North is a maze of nearly bare gullies. About a mile down the wash takes a turn South. There are several hanging gardens of mosses and ferns around seeps in the sandstone. To the East is a broad expanse of bare slickrock, Clark Bench. Soon the wash enters a canyon narrows from which there is no escape until it junctions with the wash from Wire Pass.

Perry Swale - Thousand Pockets (subarea #2)

This area is bounded by the Glen Canyon Recreation Area to the South, a powerline to the NE, the North rim of Judd Hollow to the North, and the gorge of the Paria Canyon to the West. Cedar Mountain, a sandy plateau, is the major landform of the northern half of this unit. Near the junction of Judd Hollow and Paria Canyon, this plateau breaks off for about 400'. Around this break can be found walls, potsherds, and other evidence of prehistoric Native Americans. Below this break is a broad bench about 3/4 of a mile wide which ends at the edge of Paria Canyon, a narrow chasm at this point. Along the rim can be found interesting slickrock formations and several "hanging" canyons ending in awesque drops into the Paria Canyon. This bench pinches out where the rim of the breaks and Paria Canyon merge into a massive cliff. Hiking the sandy top of Cedar Mountain, one is reminded of an Australian desert scene. Occasional breaks, slickrock domes, and piles of weirdly eroded boulders stand out in the otherwise open sand flats. Vegetation consists mainly of juniper, oak, and pinyon. Superb vistas occur frequently. One can see Boulder Mountain, the Aquarius Plateau, Bryce Canyon, the Kaibab Plateau, the Kaiparowits Plateau, the tops of the Henry Mts., Navajo Mt., the Rainbow Plateau, and the slickrock country of the Paria Plateau with its many pristine valleys. At one point you can look down nearly 2,000' of sheer cliff into the Paria Canyon. Just past this point is a basin draining into a hanging canyon. Potsherds are common in this area. The hanging canyon has a narrow gorge cut into it which "cliffs out". Climbing out of this basin to the SE a hiker is likely to come across a very old looking cairn possibly left by early white explorers. Just past this point is the very rugged escarpment flanking the East side of Cedar Mt. A few of the steep gullies and canyons which cut through this slickrock rim can be descended without a rope though some interesting route finding is involved. One could spend several days just exploring this rim. To the South the land is a rugged

Like Kaibab Gulch, the wash from Wire Pass is accessible via the House Rock Valley road. It first meanders for about one mile then begins to cut into the soft sandstones. Where this wash meets the wash from Kaibab Gulch is the beginning of Buckskin Gulch. At this junction is a wall covered with petroglyphs depicting bighorn sheep and many other symbols. The gulch at this point is about 100' deep. Beyond this point the canyon deepens rapidly and is occasionally so narrow that one must walk sideways though the canyon may be as deep as 400'. Only a few places are wide enough for a few cottonwood trees. At times one must wade through pools of water which may be chest deep. The effect is not too unlike being in a cave. Logs are jammed as much as 60' up on the canyon walls by flash floods. About halfway down the gulch is an old prehistoric toe-hold route which gives access to Clark Bench. Beyond this point the gulch is a little wider though rarely more than twenty feet. At one point a boulder choke creates a drop of about fifteen feet which may be bypassed by crawling through a hole in the boulders or utilizing a toe-hold route on a sheer faced rock nearby. Beyond this point the canyon is still quite narrow though wide enough for a few plants and trees. When one finally leaves the Buckskin Gulch and enters the narrows of the Paria Canyon it almost seems delightfully sunny and wide by comparison. A trip through the many miles of Buckskin Gulch has a spooky uniqueness about it comparable to few other places.

Clark Bench (subarea #4)

The maze of slickrock gullies to the North of Kaibab Gulch abruptly end to the SE in a bare rock surface. This is a portion of Clark Bench which lies below a rim about 1/4 mile to the North of Buckskin Gulch. Several large alcoves are developed in the large cliff face which forms most of this rim. This part of the bench is a graceful curving surface with an occasional gully

cut into it or a rock dome sticking up from place to place. It is an area of wind and stone, isolated and rarely visited. One can get excellent views into Buckskin Gulch and Paria Canyon, as well as the scenic country on the rim of Coyote Buttes, Poverty Flats, and the pristine valleys in the vicinity of White Pockets. Potsherds and flint chips are not uncommon in this area. Some interesting waterpockets can be found in this area as well. Above the rim of this first bench the views are even better of the whole backside of the Paria Plateau. Near this rim the country is mostly sand with an occasional patch of slickrock and a few domes. North of this area is a gradual arc which goes east to the head of Paria Canyon and then turns west for three miles along the south side of Long Canyon is a rugged area of slickrock gullies and washes. This area is excellent for the day hiker in search of a little exercise and adventure away from the more heavily traveled Paria Canyon. To the east of the Paria River is another small arc of similar topography and day use values. The alternating sublime and rugged landscape, the outstanding views, and pristinity of this area offer a unique fascination for those desiring a variety of wilderness oriented experiences.

"Coyote Buttes"
(subarea #5)

Viewed from House Rock Valley, Coyote Buttes are only impressive in their pristine condition with the exception of a few colorful slickrock domes poking out from behind the southern end of the Buttes. The West side is essentially pinyon and juniper studded ridges. The East side however is nearly treeless by comparison. It appears that nature has shaved this side leaving only bare rock domes, gullies, and smooth cliffs. There are several large waterpockets located in this area. A natural arch and a natural bridge can be found at the north end. One of the largest amphitheatres in the whole Paria area is located on the backside of these hills. Perhaps the most outstanding feature is the

colorful sandstone of the area. Snow whites, rusty reds, bright yellows and oranges are splashed haphazardly across the landscape. Cross-bedding and "swirls" in the sandstone greatly enhance the effect of this natural artwork. A few sparse ponderosa pine decorate some of the higher pockets where superb views of the Paria Plateau, Kaibab Plateau, Cockscorn, and House Rock Valley can be seen. Like much of the Paria country, Coyote Buttes contains numerous scattered remains of earlier peoples in the form of potsherds and flint chips. A trip to this area can only be made better by a visit from one of the many golden eagles which are found in the local skies.

The Plateau Wildlands
(subarea #6)

While much of the center of the Paria Plateau is imparted by roads and ways, the perimeter country remains largely undisturbed, pristine, and unvisited. From Poverty Flat just south of the Buckskin Gulch to the edge of the Vermilion Cliffs near White Knolls one can gradually ascend over 2,000' to where a few lonely but beautiful pockets of Ponderosa Pine can be found. This area of course is much more complex than that. Poverty Flat is an area of sand giving way to slickrock domes and buttes to the North as one nears the rim of Buckskin Gulch. Steamboat Rock and Wolf Knoll are the most prominent of these. These buttes and domes add considerable contrast and balance to the more gentle sand areas where one can see into the distance the breaks of Clark Bench and Coyote Buttes. Immediately to the East of Wolf Knoll one can peer down into the confluence of the Buckskin and Paria Canyon Narrows. Just South of Wolf Knoll is White Pocket and a more extensive area of domes, buttes, small mesas, and pristine valleys. These valleys gradually steepen until they fall into the precipitous depths of Paria Canyon. To the East of here the valleys are less canyonlike, but a series of joint or fracture oriented gorges are carved into the landscape making dramatic slashes in the slickrock. Just past these slashes

one can look down into Wrather Canyon to see Wrather Arch. One can follow the rim of Paria Canyon crossing several rolling valley and an occasionally more rugged gully until you arrive at the edge of the Plateau overlooking the mouth of the Paria at Lee's Ferry as well as Glen Canyon, Marble Canyon, Echo Cliffs, Navajo Mt., the San Francisco Peaks, and many other famous landmarks in Utah and Arizona. Just west of here along the top of the awesome escarpment of the Vermilion Cliffs is Powell's Monument and many weirdly eroded rock formations. One can follow the rim of the Vermilion Cliffs around the southern tip of the Plateau. The views along the way are simply breathtaking due to the immense drop and extensive views to the South. West of here is Sand Hill Crack, a rare break in the Cliffs which allows foot access from the top to bottom. From Wolf Knoll around to White Knolls is probably the least visited country in the whole Paria area. Limited access to this country will continue to maintain the incredible solitude and pristine condition of this country for the more adventuresome hiker. This solitude in combination with the multi-colored slickrock formations and canyons offer perhaps the best wilderness experience to be had in the entire Paria country. Interesting archeological sites and outstanding vistas top off the experience with the feeling of "what next?"...

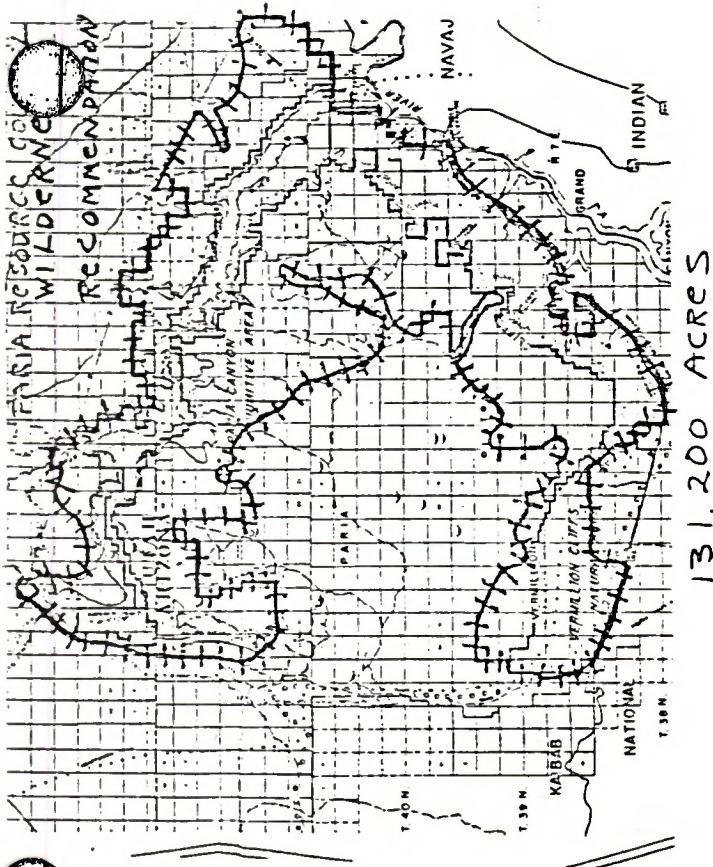
"Vermilion Cliffs"
(subarea #7)

Though millions of people have seen the Vermilion Cliffs, few have ventured off the highway to discover that the cliffs are not really that close to the road. Their massive height an extremely effective illusion of closeness. When trying to approach the cliffs one is confronted with many small tanyons and gullies interspersed with benches and some surprisingly large cliffs which from the highway look only like small ledges and hills. Gullies turn into boulders and boulders turn into house size blocks. Many of the benches are inaccessible to livestock and truck bear thick patches of native grasses.

Excellent specimens of petrified wood as well as fossil ripple marks can be viewed in the Chinle Formation at the base of the cliffs. This colorful "Painted Desert" formation creates many colorful canyons, gullies, and badland hills to wander throughout along the base of the cliffs. Looking back down from these foothills of the Vermilion Cliffs the road seems insubstantially small in the vastness of House Rock Valley and the Navajo Reservation. The Vermilion Cliffs are also being eyed ever more by climbers in search of new and different routes. While a few routes have been accomplished, there remains a near infinite number of routes offering a variety of challenges. The many large blocks around the cliff base offer the chance to combine a little bouldering with day hiking or overnight stays. The cliffs are also an important raptor habitat and likely contain nests used by golden eagles. Here and there hidden among the gullies and rockpiles are other items of interest: sandstone boulders sitting on pedestals of clay and shale; large, slow chuckwalla lizards; seeps and springs with their associated eco-niches; scattered potsherds; a short grotto cut into the Chinle; soil pipes (an interesting type of pseudo-karstic land form); etc. The colorful Vermilion cliffs and their foothills provide a unique experience for sightseers, the casual dayhiker, and those interested in more intense activities such as rock climbing or backpacking the long benches below the cliffs.

Summary, Concepts, and Recommendations

The many attributes listed in the above descriptions are by no means all of them, but rather an attempt to describe the more obvious items of interest and value. It is tempting to make comparisons within these areas, but the inherent errors which exist in such comparisons render them of little or no value. i.e. A plateau is not a canyon and vice-versa. Neither is a wilderness one particular feature of the landscape any more than one is limited to the



Bettie Holiday
2414 Palen
Buckley, AZ 85707

5/10/80

RECEIVED
MAY 14 9 04 AM '80
PHOENIX, ARIZONA

Arizona State Senator
Bureau of Land Management
2400 Valley Bank Center
Phoenix, AZ 85033

Dear Sir,

34-1 Having read the Arizona Strip Wilderness draft EIS, I have alternative 2, inclusion of canyon lands and the two primitive and one natural areas in the National Wilderness Preservation System. What is the status of the other wilderness areas in the Arizona Strip?

I thank you for making the report so readable and attractive.

Sincerely,
Bettie Holiday

page 2

PARIA CANYON PRIMITIVE AREA.

1. Add Coyote Buttes to the PA. It is not only highly scenic wilderness it is also only a short walk from existing roads thereby offering a wilderness experience to people who do not wish or are not able for extended hiking trips.
2. Develop a loop trail/route to the Coyote Buttes area. There are numerous opportunities both for short and long hiking loops using canyon approaches which are close enough so one can hike up one and return by a different one if the visitor approaches from the Coyote Road.
3. Exclude cattle from the area. It contaminates the water and can be a safety hazard. In Buckskin Canyon I met a steeping cattle near the beginning of Buckskin Gulch in a narrow canyon. Only a fast scramble on a steep incline saved me. There is no forage to speak of in this narrow section of the canyon, so increase the wilderness quality by excluding cattle.
4. Definitely include the proposed sections 6, 30, 31 etc. in R, S & E. The area in and R of Thousand Pockets area is scenic and offers good views from the rim to Paria Canyon. Access is simple and relatively short using the power line roads telephone line road and branches from these.
5. 4. Increase your visitor figures are too low and do not include people visiting this part especially from Page.
6. Add I-6 to the Paria PA. I did hike up the Lee's Ferry Spencer's Trail to the plateau above and found it having wilderness value. Numerous waterpockets make it even backpacking a delight.
7. Paria Canyon is getting intensive use. Spread out the visitor use by supplying printed information to the less visited parts of the PA. Pattern of use is greatly affected of information available. This is the reason why there are so few visitors to the rim portion of the primitive area. Give detailed information so that people can use the recently discovered Indian trail from the river to the Paria Plateau. I found the Paria Plateau with its open expanse having a high wilderness quality. Consider including large arguments of it.
8. The Alternative 2 boundaries would be the minimum boundaries for the future wilderness area and additional area from Paria Plateau added to it, from I-6 and I-8.

35

RECEIVED
JUN 5 10 24 AM '80
PHOENIX, ARIZONA

Arizona State Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix, AZ 85075

27.05.80.

Subject: ARIZONA STRIP WILDERNESS: draft.

35-1 Summary statement: I support your alternative 2 as to the future Wilderness Area boundaries, with the following added comments.

Background information: Comments are based on my hikes, backpack trips and also driving a way on backcountry roads in surrounding area. Visits were as recent as Feb/March, April 1980 but also include numerous previous trips. Over the past quarter of century, I currently do not belong to any organizations and I am not a member of any scientific or educational institutions. Perhaps I belong to the large group of wilderness users who seldom write or voice their opinions but use wilderness areas for recreation and enjoyment.

Comments:

PARIA PRIMITIVE AREA.

I wish to use this Primitive Area to point out how little BLM has done to assist the public to enjoy the designated Primitive Area.

Specific examples: On two occasions I had to give up on plans to hike to Migrants Dome due to impossibility of crossing the Virgin R. due to high water. My last and 3rd attempt was not possible either in Feb. 80. The flippancy remark to your pamphlet "If you have to cross the Virgin River so plan. In getting your feet wet" could have been made by a person void of field experience.

Suggestion: Construct a simple foot bridge across Virgin R. at the background. Post a current bulletin as to current trail conditions.

A bridge is indicated because due to this being the low elevation approach to the Primitive Area it will be used mainly in spring when the river runs high. Secondly it will be the logical end point to a traverse starting from other high elevation trailheads and one needs to be assured of a safe and feasible river crossing.

Suggestion: Signpost all trail and route beginnings and major trail junctions. On other hand I find too many signs like mileposts detracting from wilderness character.

Suggestion: Spend some effort to establish a primitive trail. In open country I find large rock cairns or a single post on key locations sufficient.

Suggestion: Issue a pamphlet with approach roads from major highways marked with distances to turn-off and road forks indicated to the tenth of a mile. Also for trail distances.

Make the adjacent lower San mountains a part of Paria P.A. even if it is physically a separate unit.

VERMILION CLIFFS NAT. REC. AREA

Construct a hiking trail to the plateau and a trail along the rim for overall views. Plateau hiking will be pleasant when the lower country is too hot. Return trail could follow a different route to make a loop hike possible. A natural place would be to follow the Bartolomeo Canyon utilizing the existing road to a stocktank.

Add boundary and the terrain beyond to the PA. The J-6 unit should be added to the PA/Vermilion PA.

It seems to be logical to combine Vermilion NA and Paria PA into one unit. Also the units J-6 and J-8 should be a natural part of this single Primitive Area wilderness unit. The higher plateau country would provide hiking opportunities during hot weather season. For me a wide open expanse gives the best feeling of solitude.

General suggestions: Have master maps and data books available to all the wilderness areas for visitor reference at all of your BLM District and Field Offices. Even if you have found the BLM personnel very helpful, the "man in the know" may be on a field trip and also pertinent information may be divided between number of individuals. On this reference maps and data book I visualize of having marked the exact locations of the roads, trails, hiking routes, water sources and quality, distances, scenic high light locations. This map should be kept up to date. Having this kind of reference material available see anyone in the office can give the information without having to explain the area data over and over again to each visitor. The amount of recreational use is a function of available information!

I should be very interested in your counter comments and above all in receiving a copy of your final decision.

Sincerely,

Harry Melts

Harry Melts
Box 70
Clearwater, B.C. VCE 1N0
CANADA

30

SIGNOFF

Major

FEDERAL ASSISTANCE		2. Date of completion		3. State and county		4. Project number	
Type of Action		Application		AZ		80-80-0024	
Name		Notification of Intent (OIT)		Date		JUN 05 1980	
Report of Federal Action		Date		JUN 05 1980		JUN 05 1980	
4. Legal Description/Remarks		Bureau of Land Management		5. Federal Employer/Agency Name		6. Progress	
a. Applicant Name		Arizona State Office		b. Project Number		c. Time	
b. Organization Unit		2400 Valley Bank Center		d. Project Name		e. Time	
c. Street/P.O. Box		Phoenix		f. Project Number		g. Time	
d. City		Phoenix		h. Project Number		i. Time	
e. State		Arizona		j. Project Number		k. Time	
f. Contact Person		Clair M. Whitlock, State Director		l. Project Number		m. Time	
g. Phone Number		(602) 261-3706		n. Project Number		o. Time	
7. Title and description of project/issue		ARIZONA STRIP WILDERNESS Draft Environmental Impact Statement and Sustainability Report		8. Type of project/issue		9. Type of project/issue	
a. Project/Issue		Bureau of Land Management		b. Project/Issue		c. Project/Issue	
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The
WILDERNESS SOCIETY

June 5, 1980

Arizona State Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix, AZ 85073

The Wilderness Society
Southwest Regional Office
P. O. Box 1160
Bismarck, NM 87004
(505) 867-3139

Dear Sir

On behalf of The Wilderness Society, I would like to commend The Bureau of Land Management for recommending wilderness designation for the Pelate Primitive Area and Paria Canyon Primitive Area/Tenmillion Cliffs National Area. Unfortunately the BLM wilderness proposals for both areas are far from adequate.

Qualifying portions of roadless areas 1-130 and 1-134 should be recommended for wilderness along with the Paiute Primitive Area.

For the Paria Canyon/Vermilion Cliffs area the following lands should be recommended for wilderness designation:

1. All of Paria Canyon Primitive Area
2. All of Vermillion Cliffs National Area (including the western half)
3. All of BLM roadless area 1-8 (Paria Plateau)
4. All of BLM roadless area 1-6 (Perry Swale)

The total acreage of this area should be around 230,000 acres recommended for wilderness.

I also would like to recommend that RIF manage the area in each a way to ascertain the normal stream flow and flash flood cycle in the Paria River.

Paria Canyon is unquestionably one of the finest HLP wild areas anywhere in the United States. It deserves the best and most thorough wilderness recommendation possible.

Sincerely

Dave Foreman
Southwest Representative

cas: Linda Leale, Debbie Sessa, Jean Horzegn, Peter Kirby



SIERRA CLUB

Grand Canyon Chapter - Arizona 53 44-85

3737 N. Country Club 2185 Tucson RS716

June 9, 1950

Mr. Clair Whitlock, Director
Arizona State Office
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85073

Dear Mr. Whitlock:

The following is the text of our comments on the Arizona Sonoran Wilderness draft Environmental Impact Statement and Sustainability Report as I presented them at the public hearing in Phoenix on May 8, 1980.

Overall the document is complete, concise and well-presented. We do feel there are some problems and have addressed those here.

38-1¹) The description of Alternative 3, the No Action Alternative, requires classification. Although not mentioned on page six, the discussion of environmental consequences on page 52 indicates that this alternative involves eliminating the primitive area designation for Paris Canyon and Puerto Primitivo Areas. Though the document does not state that the National Park Service is recommending that the primitive area could potentially have far greater impacts than either the Proposed Action or its alternatives, we feel the only real No Action alternative is to maintain primitive area designation. Alternative 3 as stated cannot properly be termed a No Action alternative, and the impacts listed below and its possible ramifications need to be expanded upon in the final document.

38-2²⁾ We find within the draft an over-emphasis upon and exasperation of the potential negative impacts of wilderness designation. Wilderness is the best tool we have for protecting natural values. All too often however we take all of its positive merit for granted and dwell on piecemeal and unsubstantiated potential detriments. For example, the same wilderness area which is the property of the Nation will have negative impacts on naturalness once visitor carrying capacity is reached. According to figures presented in the document, however, the reality is that visitor use has increased 300% in seven years. There is no reason not to assume that visitor use is going to reach carrying capacity regardless of what the area is called.

38-3 A second example involves the environmental consequences of wilderness designation upon cultural resources as discussed on page 32. The document states, "The main impact of the Proposed Action and Alternatives 1 and 2 on cultural resources would be more vandalism from increased visitor use." Again, these resources are vulnerable to a myriad of potential destroyers, including vandals, and will be more so with every passing year without wilderness protection. We find this summary of potential impacts to be inaccurate.

Printed on 100% Recycled Paper

Mr. Clair Wilcock
Attn: Eugene Murphy McCormack Draft #3
June 9, 1980
Page Two

Many of the economic, recreational and ecological values which make the Paris-Pain River Area outstanding are a result of the work of the Paris River system. Maintenance of the natural stream flow in the Paris and tributaries and continued functioning of the natural flash flood cycle are essential to preserving the recreation and the other values of this area. We request that this issue be addressed in the final document and in EPA's management recommendations for the area.

The draft outlines the definition of wilderness from the Wilderness Act of 1964 however it doesn't include other pertinent sections of the Act. Public lands under federal control would be covered by whether the Act is its entirety or as applicable in all governmental systems. An example is illustrated on page 51 where the draft states "will practice the use of mineral exploration and development except that all lands of the Act." It is important for the reader to know what Section 4 says and this draft is readily available in the document.

[illegible]

The public attitudes towards the subject are rather unbalanced. A determination that there is no uniformity of opinion among political scientists and politicians is representative of the confusion based on ill-informed views by a few political scientists. If the dominant feelings such external view feel it should be a national security matter, the subjects chosen in external and that were the subjects chosen in external. The public interest period is employed to effect public response to the subject. It is not this type of investigation.

[illegible]

Re: Claire Whitlock
Re: Arizona Strip Wilderness Draft MS
June 9, 1980
Page Three

protective of and sound land use planning for American soil. The fact that they have done so makes their attitudes and beliefs no less worthy of thorough attention.

We support wilderness designation of the Santa Catalina Area, Santa Catalina Island and the Vermilion Cliffs National Area in their entirety with the small exceptions due to lack of naturalness as described in the draft. We cannot ask for recognizing the importance of the Coyote Butte area in Alternatives 1 and 2, but hope that further study has yet to be completed on considerable areas which should be included in these boundaries.

The Paria Plateau offers very special opportunities for an extensive experience of altitude and for varied gratifying recreation. We suggest the inclusion of Inshore Inventory Unit 1-4/16 in the Paria Wilderness, and of all qualifying portions of unit 1-4, which includes the Perry Swine.

We do not support the proposal in Alternative 1 and 2 to eliminate the western end of the Vermilion Cliffs from wilderness designations. Through the Cliffs, we change in character the nature to offer outstanding recreation opportunities for sightseeing, geological study, bird-watching, horseback riding, climbing, walking or hiking.

[illegible]

21 Finally, we urge the KKK to pursue its management priority, as stated in page 71, to investigate the White and Power Associates Service with regard to its alleged complete jurisdiction over and its full presence in the

Thank you for your consideration of these emergency aid requests.

Name: Hinda Lina
 (Mrs.) Hinda Lina
 Occupation: Teacher

United States Department of the Interior

HERITAGE CONSERVATION AND RECREATION SERVICE
PACIFIC SOUTHWEST REGION
SAN FRANCISCO, CALIFORNIA 94102
450 Golden Gate Avenue Box 36062

JUN 11 1980

PSW 200
DES 80/21

Memorandum

To: State Director, BLM, Arizona
From: Regional Director, PSWRO
Subject: Review of Draft Environmental Statement and Suitability Report for the Arizona Strip Wilderness.

We have reviewed the subject document and offer the following comments.

General Comments

We commend the BLM staff for the preparation of a beautiful and well-written document. The full-color photographs are an excellent addition to the normal DEIS.

We suggest, however, that preliminary cultural resources surveys and detailed wilderness designation impact predictions need to be included in the final statement.

Cultural Resources

We recognize the beneficial cultural resources protection measures associated with wilderness designation. The proposed designation may not, however, represent compliance with the National Historic Preservation Act in regard to identification and protection of cultural resources eligible for the National Register of Historic Places.

39-1 We are concerned by the lack of cultural resources surveys of the proposed wilderness area, in light of the increased vandalism predicted as an environmental consequence on page 52. Numerical predictions, of cultural resources potentially damaged by increased visitor use and vandalism, need to be developed based on representative intensive site surveys. The estimated number of cultural resources sites in the proposed wilderness area and the percentage of recorded and undiscovered sites potentially damaged as both a direct and indirect result of wilderness designation should be predicted. Results of the surveys and estimates of potentially damaged cultural resources should be reported to the State Historic Preservation Officer and the Advisory Council on Historic Preservation for review and comment.

believe that predictions based on representative, limited site surveys will reduce the need for a survey of the entire proposed wilderness area, while facilitating development of adequate management and protection measures.

THE UNIVERSITY OF ARIZONA
TUCSON, ARIZONA 85721

COLLEGE OF AGRICULTURE
SCHOOL OF RENEWABLE NATURAL RESOURCES
300 BIOLOGICAL SCIENCES EAST BUILDING

June 13, 1980

Mr. Claire Whitlock
Arizona State Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85073

Dear Mr. Whitlock:

I have been asked by Dr. E. Lamar Smith, President, Arizona Section SRM, to review the draft EIS and suitability report for the proposed wilderness areas on the Arizona Strip. I shall try to present my comments as a member of the SRM while recognizing my personal feelings about the Arizona Strip might affect my judgement. I can appreciate that the preparers of this report faced the same problem, but they have done an excellent job of presenting all aspects in an unbiased fashion. Having done range revegetation research on the Arizona Strip over a 10-year period, I can appreciate the particular beauty and solitude to be found there.

Through this research I have become acquainted with many aspects of the climate, plants, and geology of the Strip. These factors of course directly affect range productivity and non-commodity values of the extensive rangelands found there. Such non-commodity values are implied in the proposal to include in the National Wilderness Preservation Area the Palute and the Paria Canyon Primitive areas and the Vermilion Cliffs Natural Area.

The three alternatives to this proposal and all possible environmental impacts of any actions were well presented. I concur with the general conclusion that there would not be any major adverse environmental impacts from any particular alternative chosen. However, the report did not present any particularly strong arguments in favor of one alternative over another. If the report could be faulted, it might be that it did not support adequately the proposal to add these areas to the Wilderness System.

Recreational Resources

The discussion of recreational activities in the proposed wilderness area appears to be adequate.

Paleontological Resources

39-2 No reference to potentially significant paleontological resources in the proposed wilderness area was found in the draft statement. General discussion of the age of strata and important genera found in the area should be included in the final statement, without providing detailed locality information that may subject the fossils to increased collection or destruction.

Proposed controls on collection of minerals should apply to paleontological resources as well.

Nationwide Rivers Inventory

The Heritage Conservation and Recreation Service-Pacific Southwest Region recently completed the Phase I Nationwide Rivers Inventory for Arizona, California and Nevada. A portion of the Paria River, included in the proposed wilderness area, was listed on the Phase I Inventory.

In his Environmental Message of August 2, 1979, the President directed: "Federal land management agencies shall assess whether rivers located on their lands and identified in the National Inventory prepared by the Heritage Conservation and Recreation Service are suitable for inclusion in the Wild and Scenic Rivers System; if so, these agencies shall take prompt action to protect the rivers--either by preparing recommendations for their designation or by taking immediate action to protect them."

Wilderness designation will represent a significant action toward protection of the free-flowing qualities of the Paria River that led to inclusion on the Phase I Inventory.

Formal consultation procedures will be forthcoming in the near future.

Additional copies of the Pacific Southwest Phase I Rivers Inventory are available from the Heritage Programs Division at the address listed above.



Jordan to Whitlock
Page 2
June 13, 1980

It was pointed out in the report that the BLM has developed management plans to protect and maintain the natural and scenic values of the Paria Canyon and Palute Primitive Areas and the Vermilion Cliffs Natural Area. Under the no-action alternative the condition of these areas would not change, but neither would they change under a wilderness classification.

On the basis of the evidence presented, the no action alternative appears the most suitable to meet the desires and needs of the widest variety of interests. A greater flexibility in meeting the needs of the range livestock industry would be maintained while affording equal or greater opportunities for other interests.

This seems a rather curt response to the expressions presented by a wide variety of interests. However, further discussions would appear to involve the trade-off of one environmental impact for another leading to further discussion of their relative merits and so on into the night.

While my perception of solitude and beauty could include a vision of a distant range livestock aspect, this perception is of no greater value than that which precludes any evidence of man. However, I submit that there are sufficient sites and opportunities in these areas on the Strip to meet the needs of anyone under the present management system.

The draft EIS and suitability report was most interesting and well prepared. I have appreciated the opportunity to review it.

Sincerely,

Gilbert L. Jordan
Gilbert L. Jordan
Professor, Range Management

cc: E. Lamar Smith

" 23:30

C. J. LOWE RISON JR
MEMBER
OF
THE BOARD OF DIRECTORS

June 18, 1980

Mr. Clair M. Whitlock
Arizona State Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85073

Dear Mr. Whitlock:

Subject: Arizona Strip Wilderness
Draft Environmental Impact Statement and
Suitability Report

We have reviewed the subject report and have determined that Edison does not have any facilities planned within Fort Canyon Primitive Area, Paiute Primitive Area or Vermillion Cliffs Natural Area.

Thank you for the opportunity to comment on this report.
If further information is needed, please call Mr. Fritz
Roeppe at (213) 435-1121.

Very truly yours,

C. J. Laurison, Jr.

Rebecca L. Feck
Wildlife Biologist &
Game Conservationist

Route 1, Box 73 C
Box 1, 11100, ... 27

cc. BII - ditto - Df 10-11-12-13-14-15-16-17-18-19-20-21-22-23-24-25-26-27-28-29-30-31-32-33-34-35-36-37-38-39-40-41-42-43-44-45-46-47-48-49-50-51-52-53-54-55-56-57-58-59-60-61-62-63-64-65-66-67-68-69-70-71-72-73-74-75-76-77-78-79-80-81-82-83-84-85-86-87-88-89-90-91-92-93-94-95-96-97-98-99-100-101-102-103-104-105-106-107-108-109-110-111-112-113-114-115-116-117-118-119-120-121-122-123-124-125-126-127-128-129-130-131-132-133-134-135-136-137-138-139-140-141-142-143-144-145-146-147-148-149-150-151-152-153-154-155-156-157-158-159-160-161-162-163-164-165-166-167-168-169-170-171-172-173-174-175-176-177-178-179-180-181-182-183-184-185-186-187-188-189-190-191-192-193-194-195-196-197-198-199-200-201-202-203-204-205-206-207-208-209-210-211-212-213-214-215-216-217-218-219-220-221-222-223-224-225-226-227-228-229-230-231-232-233-234-235-236-237-238-239-240-241-242-243-244-245-246-247-248-249-250-251-252-253-254-255-256-257-258-259-260-261-262-263-264-265-266-267-268-269-270-271-272-273-274-275-276-277-278-279-280-281-282-283-284-285-286-287-288-289-290-291-292-293-294-295-296-297-298-299-300-301-302-303-304-305-306-307-308-309-310-311-312-313-314-315-316-317-318-319-320-321-322-323-324-325-326-327-328-329-330-331-332-333-334-335-336-337-338-339-340-341-342-343-344-345-346-347-348-349-350-351-352-353-354-355-356-357-358-359-360-361-362-363-364-365-366-367-368-369-370-371-372-373-374-375-376-377-378-379-380-381-382-383-384-385-386-387-388-389-390-391-392-393-394-395-396-397-398-399-400-401-402-403-404-405-406-407-408-409-410-411-412-413-414-415-416-417-418-419-420-421-422-423-424-425-426-427-428-429-430-431-432-433-434-435-436-437-438-439-440-441-442-443-444-445-446-447-448-449-450-451-452-453-454-455-456-457-458-459-460-461-462-463-464-465-466-467-468-469-470-471-472-473-474-475-476-477-478-479-480-481-482-483-484-485-486-487-488-489-490-491-492-493-494-495-496-497-498-499-500-501-502-503-504-505-506-507-508-509-510-511-512-513-514-515-516-517-518-519-520-521-522-523-524-525-526-527-528-529-530-531-532-533-534-535-536-537-538-539-540-541-542-543-544-545-546-547-548-549-550-551-552-553-554-555-556-557-558-559-560-561-562-563-564-565-566-567-568-569-570-571-572-573-574-575-576-577-578-579-580-581-582-583-584-585-586-587-588-589-590-591-592-593-594-595-596-597-598-599-600-601-602-603-604-605-606-607-608-609-610-611-612-613-614-615-616-617-618-619-620-621-622-623-624-625-626-627-628-629-630-631-632-633-634-635-636-637-638-639-640-641-642-643-644-645-646-647-648-649-650-651-652-653-654-655-656-657-658-659-660-661-662-663-664-665-666-667-668-669-670-671-672-673-674-675-676-677-678-679-680-681-682-683-684-685-686-687-688-689-690-691-692-693-694-695-696-697-698-699-700-701-702-703-704-705-706-707-708-709-710-711-712-713-714-715-716-717-718-719-720-721-722-723-724-725-726-727-728-729-730-731-732-733-734-735-736-737-738-739-740-741-742-743-744-745-746-747-748-749-750-751-752-753-754-755-756-757-758-759-760-761-762-763-764-765-766-767-768-769-770-771-772-773-774-775-776-777-778-779-780-781-782-783-784-785-786-787-788-789-790-791-792-793-794-795-796-797-798-799-800-801-802-803-804-805-806-807-808-809-810-811-812-813-814-815-816-817-818-819-820-821-822-823-824-825-826-827-828-829-830-831-832-833-834-835-836-837-838-839-840-841-842-843-844-845-846-847-848-849-850-851-852-853-854-855-856-857-858-859-860-861-862-863-864-865-866-867-868-869-870-871-872-873-874-875-876-877-878-879-880-881-882-883-884-885-886-887-888-889-890-891-892-893-894-895-896-897-898-899-900-901-902-903-904-905-906-907-908-909-910-911-912-913-914-915-916-917-918-919-920-921-922-923-924-925-926-927-928-929-930-931-932-933-934-935-936-937-938-939-940-941-942-943-944-945-946-947-948-949-950-951-952-953-954-955-956-957-958-959-960-961-962-963-964-965-966-967-968-969-970-971-972-973-974-975-976-977-978-979-980-981-982-983-984-985-986-987-988-989-990-991-992-993-994-995-996-997-998-999-1000-1001-1002-1003-1004-1005-1006-1007-1008-1009-1010-1011-1012-1013-1014-1015-1016-1017-1018-1019-1020-1021-1022-1023-1024-1025-1026-1027-1028-1029-1030-1031-1032-1033-1034-1035-1036-1037-1038-1039-1040-1041-1042-

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FBI - ALBANY

43



REGION IX
215 Fremont Street
San Francisco, Ca. 94105

Project ID-BLM-K61041-AZ

Mr. Claire Whitlock, State Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix, AZ 85073

Dear Mr. Whitlock:

The Environmental Protection Agency (EPA) has received and reviewed the Draft Environmental Impact Statement (DEIS) titled ARIZONA STRIP WILDERNESS DESIGNATION.

The EPA's comments on the DEIS have been classified as Category LO-1. Definitions of the categories are provided by the enclosure. The classification and the date of the EPA's comments will be published in the Federal Register in accordance with our responsibility to inform the public of our views on proposed Federal Actions under Section 309 of the Clean Air Act. Our procedure is to categorize our comments on both the environmental consequences of the proposed action and the adequacy of the environmental statement.

The EPA appreciates the opportunity to comment on this OGIS and requests three copies of the Final Environmental Impact Statement when available.

If you have any questions regarding our comments, please
contact Susan Sakaki, EIS Coordinator, at (415)556-7858.

Sincerely yours,

Isak Mackenzie, Director
Surveillance and Analysis Division

enclosure

FILE CATEGORY CODES

Environmental Impact of the Action

10—Lack of Objections

10--Lack of Objections

EPA has no objection to the proposed action as described in the draft impact statement; or suggests only minor changes in the proposed action.

ER—Environmental Reservations

EA--Environmental Reservations

EPA has reservations concerning the environmental effects of certain aspects of the proposed action. EPA believes that further study of suggested alternatives or modifications is required and has asked the originating Federal agency to reassess these aspects.

E1-Environmentally Unsatisfactory

EPA believes that the proposed action is unsatisfactory because of its potentially harmful effect on the environment. Furthermore, the Agency believes that the potential safeguards which might be utilized may not adequately protect the environment from hazards arising from this action. The Agency recommends that alternatives to the action be analyzed further (including the possibility of no action at all).

Adequacy of the Impact Statement

Category 1—Adequate

The draft impact statement adequately sets forth the environmental impact of the proposed project or action as well as alternatives reasonably available to the project or action.

Category 2—Insufficient Information

EPA believes that the draft impact statement does not contain sufficient information to assess fully the environmental impact of the proposed project or action. However, from the information submitted, the Agency is able to make a preliminary determination of the impact on the environment. EPA has requested that the originator provide the information that was not included in the draft statement.

Category 3—Intermediate

EPA believes that the draft impact statement does not adequately assess the environmental impact of the proposed project or action, or that the statement inadequately analyzes reasonably available alternatives. The Agency has requested more information and analysis concerning the potential environmental hazards and has asked that substantial revision be made to the impact statement.

If a draft impact statement is assigned a Category 3, no rating will be made of the project or action, since a basis does not generally exist on which to have such a determination.

Dear Sirs,

44-1

I strongly suggest the recommendation of the largest possible area in the Arizona Strip as wilderness. Alternative 2 is an absolute MUST. This fragile and beautiful desert needs protection. Support for this wilderness is strong across America. Follow the conservationists' proposal!

Sincerely,
Ken Goldsmith

45
JUN 19 11 21 AM '80
JUN 17 1980
F.B. MONTANA

Arizona State Director
Bureau of Land Management
P.O. Box 250
Phoenix, Arizona 85003

Dear Sirs:

45-1

I am opposed to the wilderness area in Mohave County. Especially in the strip and the Hualapai Mountains. I feel this would do two things if the wilderness proposal goes through. 1. It would keep a large portion of the people out because they are to old to walk in and they do not ride horses, this in my opinion is discrimination. 2. Mohave County is a highly mineralized county. This would have an adverse effect on the mining industry. It would also affect the cattle industry as a wilderness area would not be able to maintain those water elements because equipment could not be brought in to do the work, also salt has to be distributed through the area.

45-2

I have been in Mohave County for 51 years, the area that is being proposed for wilderness has things that are wilderness and is still wilderness without the designation.

I am opposed at the exclusion of a vehicle capable of traversing the country on a two track road. I don't think anyone has the right to say that a two track road traversing the country is not a road. All roads leading into the country have a start and a destination and these roads were built in the most accessible area, because there would be no access to the remote areas of Mohave County. I have traveled extensively in the back country of Mohave County on these two track roads in a wheel drive vehicle in some instances these did not have a vehicle on these roads in months. However they are there to be used in case they are needed.

There is no way that the country that you are proposing for wilderness could be traveled without these roads. You cannot travel cross country without some kind of a road due to the formation of the country. The Hunter, Fisherman and Picnickers would be denied access.

So it all boils down to one segment of the people, the young and ablebodied.

So, again I am opposed to these areas becoming wilderness areas. If this sounds like a personal matter, it is.

A. L. Finch

Arlise L. Finch
Mohave County Sportsman Club
705 W. Spring St.
Kingman, Arizona 86401

46

RECEIVED

June 25, 1980

JUN 27 80

Bureau of Land Management
Wilderness
P.O. Box 250
St. George, Utah 84770

Re: Vermillion Cliffs,
Paiute & Paria
Arizona

Gentlemen:

1	2	3	4	5	6	7	8	9	10

46-1

We would like to express our support for the Bureau of Land Management recommendation of 34,682 acres wilderness in the Paiute Primitive Area and for the conservationist proposal of 241,011 acres for wilderness to the Paria/Vermillion Cliffs area (including units 1-6 & 1-8/19).

We feel these areas offer unique and outstanding opportunities for solitude and primitive recreation and should be protected with a wilderness designation.

Thank you for your consideration.

Sincerely,

Mr. & Mrs. D. J. D'Amico

Mr. & Mrs. D. J. D'Amico
1328 Pitch Way
Sacramento, CA 95825

47

BOZEMAN INTERNAL MEDICINE ASSOCIATES

300 NORTH HILLSDEN
BOZEMAN, MONTANA 59718
TELEPHONE 400/957-5853

RICHARD D. JERNEY, M.D.
CARDIOLOGY

ROBERT A. HATHAWAY, M.D.

6/25/80

Dear Sirs:

47-1

Please make my letter part of the official record. I am in favor of the BLM recommendation of 34,682 acres for wilderness in the Paiute Primitive area. Additionally I favor a 241,011 acre wilderness area in the Paria Canyon and Vermillion Cliffs areas.

Richard D. Jerney M.D.

Richard D. Jerney M.D.

48

1235 8th Avenue West
Seattle, Washington 98119
June 23, 1980

BLM Wilderness
P.O. Box 250
St. George, Utah 84770

Re: Paria/Vermillion Cliffs
Wilderness, Units 1-6 and
1-8/19

Dear Sir:

In 1970, my family and I drove extensively through this area, camping out nearby, and enjoyed it very much. It is an area of not only wilderness beauty but some historic value for the original Spanish explorations which crossed the Colorado River in this area.

I hope that it can be designated wilderness.

Sincerely,

Charles M. Bagley, Jr., M.D.

49

Henry Peck
534 Rockwater
New Carlisle, Ohio, 45154

June 27, 1980

BLM Wilderness
PO Box
St. George, Utah, 84770

Dear Sirs:

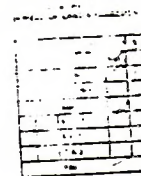
I am requesting that the Bureau of Land Management recommendation of 34,682 acres for wilderness in Paria and the Conservationist proposal of 241,011 acres for wilderness in Paria Vermillion Cliffs, including units 1-6 and 1-8 be supported. We need all the wilderness we can get. Thank you for your attention.

Sincerely yours,

Henry Peck

RECEIVED

JUN 30 1980



50

COOK, WA 98605
June 26, 1980

BLM, Wilderness
P.O. Box 250
St. George, UT
84770

Dear Sir or Madam,

I would like to support the BLM recommendation of 34,682 acres for wilderness in the Paria Primitive area.

I would also like to support the conservationist proposal of 241,011 acres for wilderness in Paria Canyon & Vermillion Cliffs, including units 1-6 and 1-8/19.

Sincerely,

Catherine C. Johnson

RECEIVED

JUN 30 1980



51

I am writing to support your proposal for a Paria Primitive Area wilderness area of 34,682 acres.

I was also pleased to see that you proposed 192,325 acres in the Paria Canyon & Vermillion Cliffs area. However, I urge you to enlarge that area to fit the boundaries proposed by conservationists. The larger area of 241,011 acres is suitable for wilderness & this is a truly spectacular area & deserves all the protection it can get. I would especially like to see units 1-6 & 1-8/19 included.

Wilderness is a greatly needed concept in America today, & the

Arizona Strip area is certainly one of the most appropriate areas for it, since it is so wild & isolated. Please give these areas the recognition they deserve as wilderness.

Sincerely,
Cheri Carlson

RECEIVED

JUN 30 1980



July 25, 1980

Bureau of Land Management

The Arizona Strip, wild & isolated country, should be added to the National Wilderness Preservation System. Especially, certain outstanding areas of the strip should fall under this Preservation protection - namely the Painted Primitive area for which the BLM has proposed 34,682 acres for wilderness. I am in full agreement with this proposal.

The Paria Canyon and Vermilion Cliffs including the Paria Plateau is an

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JUN 30 1980
BUREAU OF LAND MANAGEMENT
U.S. DEPARTMENT OF THE INTERIOR

(2)
rich and spectacular region, for which the Bureau has recommended 192,525 acres for wilderness. My own belief is that this is not enough acreage for this region - as a conservationist I would like to see a larger area - 241,011 acres added to the National Wilderness Preservation System.

Sincerely yours,
Francis Delfar
6000 Coldwater Canyon #1
No. Hollywood, Calif. 91606

RECEIVED
JUN 30 1980
BUREAU OF LAND MANAGEMENT
U.S. DEPARTMENT OF THE INTERIOR

June 24, 1980

Arizona Strip District Office
Bureau of Land Management
P.O. Box 450
St. George, Utah - 84770
Gentlemen -

I enclose in my confirmation of your choice of areas in your district to be designated as wilderness.

As much as I am sure I would have enjoyed it, I have never reached in any part of your area. Maybe some day I'll get lucky.

I'm giving thanks on this as a small contribution to help land inflation.

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U.S. DEPARTMENT OF THE INTERIOR

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U.S. DEPARTMENT OF THE INTERIOR

53

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JUN 30 1980
BUREAU OF LAND MANAGEMENT
U.S. DEPARTMENT OF THE INTERIOR

June 25, 1980

To whom it may concern:

Just a note to let you know we support the BLM's recommendation of 34,682 acres for wilderness in Painted, and the conservation proposal of 241,011 acres for wilderness in Paria/Vermilion Cliffs, (including units 1-6 & 1-5/17).

Rita Zellman
Ellen Zellman

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JUN 30 1980
BUREAU OF LAND MANAGEMENT
U.S. DEPARTMENT OF THE INTERIOR

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JUN 30 1980
BUREAU OF LAND MANAGEMENT
U.S. DEPARTMENT OF THE INTERIOR

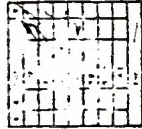
55

June 26, 1980

Division of Land Management
Wilderness
P.O. Box 255
St. George, Utah 84770

RECEIVED

JUN 30 1980



Dear Sir:

I am writing to express my support for the BLM recommendation to establish a 34,682 acre Piute-Holderness unit, and for the conservationist proposal of a 241,011 acre Paria/Vermillion Cliffs-Holderness unit in Arizona.

Each of these areas provides outstanding recreational opportunities in remarkably scenic and wild country. Holderness designation is essential if the pristine character of the land is to be preserved.

Sincerely,

Janet Stuber Wood
1532 160th Street, Camas, WA 98607
Tacoma WA 98409

57

New Mexico

RECEIVED

WILDERNESS STUDY COMMITTEE



BLM-Wilderness
St. George, Utah

June 26, 1980
Albuquerque

Gentlemen:

The trip down through the Paria Canyon has to be one of the more interesting adventures on foot that can be found. I am not familiar with the proposed boundaries of the 241,011 acre conservationist proposal, including the Vermillion Cliffs, but a three day tour of the rimrock just north of the Cliffs was a wild experience, also.

Wilderness management of the area, particularly in defense of ^(existing) future ideas of dam building, or other destructive uses, is probably the wisest choice of action.

Sincerely,
L. McDonald
INCEOR

58

June 26, 1980

29900 Highway 20
Fort Bragg, California 95437

For the Public Hearing Record

BLM Wilderness
KB 750
St. George, Utah 84770

RE: Wilderness Proposals.

Members of the BLM Wilderness Planning Team:

Please include these comments and suggestions as part of the public hearing record on BLM Wilderness Proposals.

I wish to support the BLM recommendation of 34,682 acres for wilderness in Piute, and the conservationist proposal of 241,011 acres for wilderness in Paria/Vermillion Cliffs. This would include units 1-6 and 1-6/15.

The Paria Canyon and Vermillion Cliffs conservationist wilderness proposal includes the Paria Plateau, the twisting narrow canyon system that cuts through it, and the spectacular spectacular escarpment that rises over 1000 feet above the valley floor. The conservationist proposal is for 241,011 wilderness acres.

The Piute Primitive Area is located in the extreme western part of the Arizona Strip, and includes the sharp granite backbone of the Virgin Mountain range, and its rugged western drainage. This diverse area contains life communities ranging from Mojave to Douglas fir forests.

These areas are part of the wildest, most isolated country in the contiguous United States. It seems clear that all of these areas are prime wilderness, and meet all of the criteria for wilderness designation.

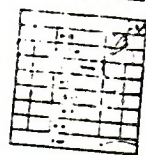
I urge that wilderness proposals for Piute, and an expanded wilderness proposal for Paria/Vermillion Cliffs be submitted to the Congress for action which will include all of these outstanding wilderness areas in the National Wilderness Preservation System.

Thank you for your consideration.

Ken Guntner

RECEIVED

JUN 30 1980



59

TO

State Director for BLM.
P.O. Box 250
St. George, Utah
84770

RECEIVED
JUN 11 1980

6/27/80

Dear Sir,

I am writing to you in reference to certain areas near your state's border; namely the Arizona Strip which is perhaps some of the wildest, most isolated ~~for~~ areas in the country. The Paria Canyon and colorful Vermillion Cliffs proposal will also include the Paria Plateau giving a panoramic view of the valley floor 4,000 ft. up. Please support the conservationist proposal for 241,011 acres of wilderness.

I'd also like to bring a special attention to Pinta Area which is a proposal of 34,682 acres will include such a diverse view as the Mojave Desert to Douglas fir tree forest.

Please give time and serious thought to my request for the salvation of some of man's last wilderness refuges.

Thank You,

Margaret Thomas

Margaret Thomas

64125 King DR

Elko, ID 86237

60

RECEIVED
JUN 11 1980

Danny Simon
3123 Mentor
Wichita, Kansas
67213

Dear Director

I am writing to express my support for the Bureau recommended 34,682-acre Pinta Primitive Area wilderness proposal. And my support for the conservationist proposed 241,011-acre Paria Canyon and Vermillion Cliffs wilderness proposal (including units 1-6 and 1-8/19).

These outstanding areas of the Arizona Strip would make excellent additions to the Wilderness System.

Please add my support for wilderness of 34,682 acres in Pinta and 241,011 acres in the Paria Canyon/Vermillion Cliffs area.

Sincerely,
Danny Simon

61

4435 Brindley St.

San Diego, CA 92117

June 27, 1980

BLM, Wilderness
P.O. Box 250
St. George, UT 84770

Dear Sir:

I am pleased that the Bureau of Land Management has recommended 34,682 acres for wilderness in Pinta.

The area that includes the granite backbone of the Virgin Mountain range with its dramatic and the fine Douglas fir forests is definitely suitable for wilderness designation.

The Paria Canyon and Vermillion Cliffs ^{proposed} wilderness area is spectacular and colorful and is also suitable for wilderness designation. However, I hope the acreage for wilderness can be increased to 240,011 acres and include units 1-6 and 1-8/19 as more of this fine area can be protected.

Sincerely,

Margaret Thomas

RECEIVED

JUN 12 1980

62

SEARCHED	INDEXED
SERIALIZED	FILED
JUN 28 1980	
FBI - ST. GEORGE	

June 28, 1980

BLM, Wilderness
P.O. Box 250
St. George, Utah

Dear Sir:

I am writing to indicate my support and approval for your recommendation of Wilderness designation for 34,682 acres of the Pinta area.

I am also pleased with your designation of 192,525 acres for Wilderness in the Paria Canyon/Vermillion Cliffs area. However, I do feel that this is not quite a large enough area, and would urge you to increase it to 241,011 acres, which would include Units 1-6 and 1-8/19. These additional acres are well worth preserving and will add to the ecological diversity and completeness.

I have done some traveling and hiking in the Arizona Strip country and have been thrilled with its beauty. I feel sure that future generations will be eternally grateful to BLM for preserving for them these refuges from the asphalt jungles of the 21st century!

Sincerely,

William F. Farnham
William Farnham

41124 1st St
St. George, UT 84770
84770

JUNE 28, 1980

BUREAU OF LAND MANAGEMENT
WILDERNESS INVENTORY & REVIEW
BOX 250
ST. GEORGE, UTAH 84770

RE: PIUTE, PARIA & VERMILLION CLIFFS ISAS

DEAR BLM:

I FULLY SUPPORT YOUR RECOMMENDATION OF 34,682 ACRES AS SUITABLE FOR WILDERNESS IN THE PIUTE PRIMITIVE AREA IN THE ARIZONA STRIP. THIS AREA WILL MAKE AN OUTSTANDING ADDITION TO THE WILDERNESS SYSTEM.

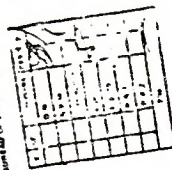
FOR THE PARIA CANYON & VERMILLION CLIFFS AREA I URGE A RECOMMENDATION OF 241,011 ACRES AS SUITABLE FOR WILDERNESS. THIS RECOMMENDATION INCLUDES UNITS 1-6 AND 1-18/19 AND IS LARGER THAN THE RECOMMENDATION YOU CURRENTLY PROPOSE. I URGE YOU TO INCREASE THE ACREAGE IN YOUR WILDERNESS PROPOSAL FOR PARIA CANYON/VERMILLION CLIFFS.

SINCERELY,

Linda Wade
1408 WEST 4TH ST.
L.A., CA 90017

RECEIVED

JUL 3 - 80



65

Dear Sir,

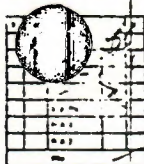
We write in support of keeping ~~the~~ the Arizona strip wild. In particular we refer to the Paria Canyon and Vermillion Cliffs wilderness proposal, including the Paria plateau, which we feel should encompass 241,011 acres. We would also like to support the BLM's recommendation of 34,682 acres of wilderness for the Piute Primitive area in the extreme eastern part of the strip. Thank you for your time,

Paul Selig
David J. Epstein
Patricia S. Firth

RECEIVED

JUL 3 - 80

BUREAU OF LAND MANAGEMENT



David Seligman Assoc. Inc. BLM
117 California St.
San Francisco, CA 94111

6824-A Sawtelle Way
Sacramento, Calif., 95826
June 30, 1980

Bureau of Land Management
WILDERNESS
P.O. Box 250
St. George, Utah, 84770

RE: Vermillion Cliffs, Piute and Paria

Gentlemen:

Your recommendation for 34,682 acres to be preserved as Wilderness in the Piute Primitive Area is excellent, and I am very much in favor of it.

Also, I strongly favor the proposal made by the conservationists of preserving 241,011 acres in the Paria Canyon and Vermillion Cliffs areas (including 1-6 and 1-8/79) as Wilderness.

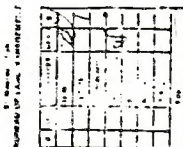
Please, I implore you, include these areas in your Wilderness Preservation designation. Their unique and unusual features must be kept as a part of our natural resources which can be passed on to future generations.

Sincerely yours,

Margaret M. Ryall
Margaret M. Ryall

RECEIVED

JUL 3 - 80



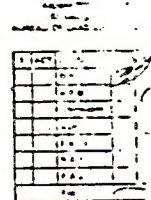
66 1312 Apache
Richardson 75080
6/29/80

BLM Wilderness
POB 250
ST GEORGE UT 84770

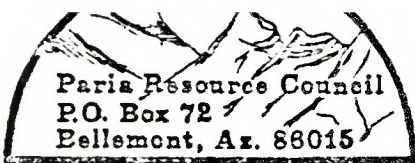
Dear Sirs,

I support the BLM recommendation of 34,682 acres for Wilderness in Piute, and the Conservationist proposal of 241,011 acres for wilderness in Paria/Vermillion clifs.
RECEIVED

JUL 3 - 80



Don Purinton
Don Purinton



RECEIVED
STATE OFFICE
JAN 1 1981
7:35 AM
ENR, ALBUQUERQUE
July 8, 1980

Mr. Gary Whitlock, Director
Bureau of Land Management
1600 West Bank Center
Phoenix 85003

67

Enclosed are the comments the Paria Resource Council would like to make on the Arizona Strip Wilderness draft EIS and Suitability Report. We will make specific comments only on the portion of the document that deals with the Paria and Vermillion areas. The Paria Resource Council is made up of individuals from southern Utah and northern Arizona that are concerned about the ecologically sound management of the resources found in the Paria Plateau area.

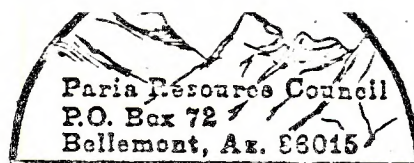
First, we would like to compliment the BLM for the inclusion of the photographs. This is an excellent way to depict the character of the land. It also clearly points out the outstanding quality of the diverse land forms and the scenic delights to be found in the Paria area.

We have already given the BLM a copy of our description of the area and our wilderness proposal of approximately 11,280 acres. This was presented at the public hearing in Flagstaff on June 4th. The main difference between alternative 2 and our proposal is the inclusion of the western portion of the Vermillion Cliffs National Area. This area offers the same outstanding recreational experiences as the rest of the Vermillion Cliffs. Refer to the attached map for the elimination of resource conflicts.

67-1 The environmental consequences on page 1 need some serious revisions. The impact to cultural resources is stated backwards. Many examples can be cited where cultural resources are better protected by prohibiting vehicular access. Horseshoe Canyon in Canyonlands National Park is a good example of the difference. There is more damage to the panels that are accessible by vehicle than those that reached only by walking.

67-2 The question of carrying capacity is not properly addressed. The Paria area is so well known that wilderness designation will not increase visitor use. The recognition of outstanding contiguous areas in our proposal will do a great deal to diversify use in the area.

On page 25 where it deals with firewood collection it should be noted that there is illegal cutting of live piñon pine trees on the rim around Cedar Mountain. Our proposal would restrict vehicular access to this area and also protect a fine stand of Mexican needle grass (*Stipa neotricha*) in the same area.



67-3 The evaluation of public attitudes on page 11 needs to be expanded. By over-emphasizing the EIS, an unbalanced view is presented. Such places as Flagstaff are not even mentioned. We are about the same distance from the Paria as St. George, and we certainly have a substantial population. Flagstaff also is one of the main entrance points to the EIS. Both Flagstaff and Page contribute to the awareness of travelers of what is available in the Paria area. We also contribute a significant part of the users of this area.

It is also important to note that within the EIS there is a significant segment of the population that is concerned with the ecologically sound management of this area. Wilderness is certainly recognized by this group as a valid use of the land. It is also necessary in fairness to include that most studies show an increased desire by Americans for wilderness and resource protection.

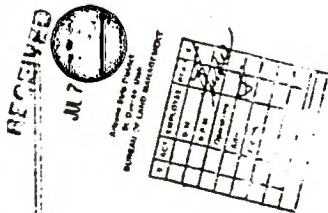
On page 58 it should be stated that wilderness designation does not change the air quality standards. This is mentioned on page 52 but it should be reiterated in this section for clarification that this attitude is mistaken.

67-4 It is important to clarify the effects on grazing within the proposed wilderness area. Since we are in favor of those local life styles that recognize and practice the wise use of the land, we feel that wilderness will better protect the rights of ranchers than the disruptive changes from large power projects. It is necessary to stress that wilderness designation does not prohibit grazing. The Wilderness Act, section 251.76 b and the water resources special provision are applicable for the rancher in having access to stock tanks within the proposed wilderness area.

67-5 On page 76 we feel that the criteria used for the evaluation of an outstanding opportunity goes against Organic Act Executive 71-41, change 3, f-2 (boundary adjustments) and f-1 (rating system). From the 5th paragraph, "However, the altitude in this area cannot be considered to be outstanding when compared to the canyons of the Pecos or Paria River, or to the Cockscorn." Also, from the 12th paragraph, "The standard for determining whether an opportunity for primitive recreation is outstanding is based upon the current type of use that occurs within the Paria Canyon Primitive Area." From our field investigations we have found outstanding opportunities for primitive recreation and solitude in the benchlands above the canyon and we have adjusted our boundary proposal to include these areas.

It should be emphasized that wilderness does not have to be confined to canyons. Portions of the document recognize that fact and the EIS should be amended for the most part on the job they have done in the preparation of this document. Anyone who has been to Coyote Buttes or Thousand Pockets will agree that these contiguous areas are an integral part of the superb wilderness found in the Paria.

For the Paria Resource Council:
Paul Ambreth
P.O. Box 72
Bellemont, AZ 88015



68

John L. Hiron
1343 Kirby Lane
#32
Jual, Maryland
20811
June 20, 1980

Dear Sir/Madam,

I wish to voice my support for the BLM recommendation of 34,682 acres for wilderness in the Painted Desert area. This area has many outstanding wilderness characteristics which warrant wilderness status. The surrounding wild, isolated country.

Regarding the Paria/Vermillion Cliffs BLM proposal of 192,525 acres for wilderness, I believe the proposal greatly understates average desirability of wilderness status. I support the 241,011 acre proposal which includes units 1-6 and 1-8/19. This expanded proposal meets all the criteria of wilderness study especially in terms of "opportunities (outstanding) for recreation or primitive travel and solitude." I urge you to further consider the proposed proposal. Please keep me apprised of any future developments concerning these areas.

Sincerely,
John L. Hiron



69

B.L.M.
Wilderness
P.O. Box 250
St. George, Utah 84770

Dear Sir/Madam -

As one who has visited the Strip country several times, I have perhaps learned to appreciate more than most, certainly quite a bit. Because its wilderness attributes are one of its most endearing traits, it is appropriate that much of it that otherwise qualifies be designated as such.

Therefore, I urge you to recommend two large areas as wilderness - the BLM proposal for 34,682 acres for the Painted Desert area, and the conservationists' proposal of 241,011 acres for the Paria Canyon/Vermillion Cliffs area.

Thank you.

Sincerely,
In A.W.

2124 Broadway
San Diego, Calif. 92102
June 28, 1980

Yours sincerely,
J. and H. F. McClymonds

[illegible]

222-217,
 Red Sand
 No. 3220

[illegible]

Carpenter

RECEIVED

08-27

[illegible]

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4	1000	100
5	1000	100
6	1000	100
7	1000	100
8	1000	100
9	1000	100
10	1000	100

Sincerely,
Richard Spotts

6330 Havenside Drive, #5
Sacramento, CA 95831

Dear Sir or Madam,

I am writing in support of your wilderness proposals of 241,680 acres in the Paria & Vermillion Cliffs areas and 35,000 acres in the Piute area. I support all U.S. Forest Service wilderness proposals and BLM proposals because so much of this country's ideas were built around wilderness.

Texas has no Federal lands from which to carve wilderness areas so we must accept areas in other Western States.

Jul 7-80

ACTION THIS FORM IS TO BE USED FOR BUREAU OF LAND MANAGEMENT	
ACT	COMPLETED
1. ACT	1. COMPLETED
2. ACT	2. COMPLETED
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7. ACT	7. COMPLETED
8. ACT	8. COMPLETED
9. ACT	9. COMPLETED
10. ACT	10. COMPLETED

Thank You,

Byron Brewer
2301 S. Austin #215
Amarillo, TX 79109

July 2, 1980

Dear BLM,

I am writing concerning the area proposed for wilderness north of the Grand Canyon.

The Paria Canyon and Vermillion Cliffs wilderness proposal includes the Paria Plateau.

This area includes a twisting, narrow canyon system, which BLM is recommending 192,525 acres as wilderness. However, I support 241,011 acres instead.

I support the BLM recommendation of 34,662 acres for wilderness in the Piute Primitive area.

Yours Truly,
Gerald Bruto
150 S. Coach #285
La Habra, CA 90631

July 2, 1980

Bureau of Land Management (Wilderness)
Box 250
St. George, UT 84770

Dear Sir: re - SUPPORT FOR WILDERNESS

I would like you to know that I support WILDERNESS as follows:

1) Paria Canyon and Vermillion Cliffs wilderness proposal -

I understand that BLM is recommending 192,525 acres for wilderness.

I strongly believe that 241,011 acres are more suitable for wilderness, including units 1-6 & 1-8/19.

The total of 241,011 acres should most certainly be included in the wilderness proposal.

Please do give this wilderness the support it deserves.

2) Piute Primitive Area -

I support your wilderness proposal of 34,662 acres for this area.

Thanking you for helping to save our wild desert heritage,

Sincerely,

C. Balloun
4440 Santa Monica #20
San Diego, CA 92107

RECEIVED

Jul 7-80

ACTION THIS FORM IS TO BE USED FOR BUREAU OF LAND MANAGEMENT	
ACT	COMPLETED
1. ACT	1. COMPLETED
2. ACT	2. COMPLETED
3. ACT	3. COMPLETED
4. ACT	4. COMPLETED
5. ACT	5. COMPLETED
6. ACT	6. COMPLETED
7. ACT	7. COMPLETED
8. ACT	8. COMPLETED
9. ACT	9. COMPLETED
10. ACT	10. COMPLETED

George A. Bridges
3124 Brophy Drive
Sacramento, CA 95821

July 2, 1980

BLM, Wilderness,
P.O. Box 240, St. George, UT 84770

Dear Sir:

We are writing to express our support for the Bureau of Land Management recommendation of 34,662 acres for wilderness in Piute, and the Conservationist proposal of 241,011 acres for wilderness in Paria/Vermillion Cliffs (including units 1-6 and 1-8/19). We hope to visit the Arizona Strip and southern Utah in August of this year.

Sincerely,

George A. Bridges

RECEIVED

Jul 7-80

ACTION THIS FORM IS TO BE USED FOR BUREAU OF LAND MANAGEMENT	
ACT	COMPLETED
1. ACT	1. COMPLETED
2. ACT	2. COMPLETED
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10. ACT	10. COMPLETED

78

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JUL 7 - 80



ANIMAL
PROTECTION
INSTITUTE
OF AMERICA

July 2, 1980

Bureau of Land Management
Wilderness
P. O. Box 250
St. George, UT 84770

Dear Sirs:

On behalf of the Animal Protection Institute's 100,000 members, I would like to support the Paiute Primitive Area, the Vermilion Cliffs, and the Paria Canyon for inclusion as wilderness.

These fall in an area which is among the wildest and most isolated portions the United States has to offer. They are very important for preserving the pristine wildlife communities of the Southwest and are large enough to allow for the preservation of these intact.

This area has many spectacular canyons and ridges and a diverse collection of life communities ranging from Mojave Desert to Douglas fir forests.

We at API would like to go on record as supporting the BLM recommendation of 34,682 acres for wilderness in Paiute and, in addition, the conservationist proposal of 241,011 acres for wilderness in the Paria/Vermilion Cliffs area (including units 1-6 and 1-B/19.)

Most sincerely,

David Butler
Research Services

DB:js



Capstone

79

112 Melburn Rd
Oak Ridge, TN 37830
June 30 1980

BLM (Wilderness)

Box 250

St. George, Utah 84770

Dear BLM:

I urge you to add units 1-6 and 1-B/19 to the recommended Paria Canyon/Vermilion Cliffs wilderness. I have traveled in this area and believe that the spectacular cliffs and canyons offer outstanding opportunities for solitude and nonmechanized recreation. This area is a unique desert area of unsurpassed naturalness which is preeminently suited for wilderness designation.

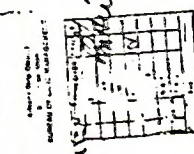
I also support the establishment of a Piute wilderness as recommended by BLM. This is a multi-faceted area containing outstanding congregations of varied biological communities of great scientific value.

Sincerely,

Andrew P. Butler
Andy Butler
112 Melburn Rd.
Oak Ridge, TN 37830

RECEIVED

JUL 8 - 80



80

July 3, 1980

Dear BLM:

I am writing to support recommendations that Paria Canyon and Vermilion Cliffs plus the Paiute Primitive Area be designated wilderness areas. Even though the official deadline for comment may be past, I would like to add my support for this action to the record.

The Grand Canyon is perhaps our most famous and, increasingly, controversial National Monument. Its beauty and drama are so striking that hundreds of thousands of us invade its cliffs with cars and buses and bear camps every year. To have areas surrounding this unique terrain, complementing it and more strictly protected from our destructive curiosity, seems to be extremely just and wise--both for those humans who enjoy true wilderness and for the wilderness itself.

In addition, I wish to advocate that the larger portion of the Paria Canyon and Vermilion Cliffs areas be designated wilderness--not the smaller 192,575 acre proposal, but the full 241,011 acres. This section of our country contains huge tracts of recreation areas and national parks--Zion, Bryce Canyon and Glen Canyon, Capitol Reef, the Grand Canyon, and Lake Mead. It is clearly an area of great beauty and ecological diversity. The park areas, however, are seriously threatened by overuse and development, by the inevitable pollution that accompanies picnics and camps and people shouting at children.

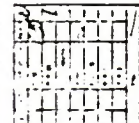
The more of this region that can be protected by a wilderness designation from both gross and subtle effects of such pressure, the better. Designating as much as possible of this striking country as wilderness can provide the range of untouched terrain that is necessary to buffer sensitive wildlife, delicate plants, and fragile water purity against the insidious intrusion of civilization while drifts on the wind and waves down canyons, as well as strays over the ground.

I appreciate your efforts in advocating for these areas, and I encourage you to include as much as possible of the land in your final package.

Sincerely,

David Butler
David L. Butler
1103 2nd St.
Oregon City, Oregon 97055

Capstone



81

July 7, 1980

Dear Sirs:

I am writing concerning the BLM recommendation for a 34,682 acre Paiute Wilderness. I fully support this plan. However, the BLM recommendation for a 192,575 acre Paria/Vermilion Cliffs Wilderness is too small. The 241,011 acre area proposed in the Conservationist Proposal is much more appropriate for this beautiful area. Thank you.

Sincerely,

Margo Forte
726 N. 91 Place, #111
Orem, NE 58114

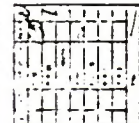
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JUL 8 - 80



RECEIVED

JUL 8 - 80



82

July 3, 1980

Bureau of Land Management (Wilderness)
Box 250
St. George, UT 84770

I am writing to express my support for wilderness recommendations of 241,011 acres in the Paria Canyon and Vermillion Cliffs areas of Arizona, and 34,682 acres in the Pinta Primitive Area.

Please include units 1-6 and 1-8/19 for a total of 241,011 acres in the Paria Canyon and Vermillion Cliffs proposal. The Pinta Primitive Area contains a diverse range of biological resources and should be proposed for wilderness with a total of 34,682 acres.

Thank you for considering my views.

Sincerely,
Kathryn A. Neume
Kathy Neume
2020 N. 16th, #5
Bismarck, North Dakota 58501

RECEIVED

JUL 10 1980



83

El. Irving Ave.
Hinton, N.J.
07014
Jul-5th 1980.

Dear Sirs,

As a citizen and wilderness lover I wish to inform you of my support of your recommendation of 24,682 acres in Palute. I am also in support of the conservationist proposal of 241,011 acres for wilderness in Paria Canyon Cliffs. Including Units 1-6 and 1-8/19.

Sincerely,

Pat Salem
Palute Conservationist

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JUL 10 1980



84

Dear Sirs:

We are writing concerning wilderness areas in Vermillion Cliffs, Paria Canyon and Pinta. We'd like you to know that we support your recommendation of 34,682 acres for wilderness in Pinta but would like to see 241,011 acres in Paria/Vermillion Cliffs, not the 192,525 acres suggested. These areas are wild, beautiful country & we'd like to see them saved once there are no more of their kind left.

Thank you,
John M. Kuehn
Dennis M. Kuehn
4347 Fort Dodge Dr. Slinger, WI 53082

85

29 Willow Avenue
Middletown, Rhode Island
02840

Bureau of Land Management
(Wilderness)
Box 250
St. George, Utah, 84770

Gentlemen:

As a Conservationist I support 241,011 acres for wilderness for the Paria Canyon and Vermillion Cliffs wilderness area. These areas include sections 1-6 and 1-8/19. I support the proposal of 34,682 acres for the Pinta Primitive Area Wilderness.

Sincerely,
Mark C. Goldberg
Conservationist
Rhode Island

86

7-11-80

Dear Mr. Director,

Thank you for the recommendation of 34,682 acres for wilderness in Pinta Primitive Area and 192,525 acres for wilderness in Paria Canyon and Vermillion Cliffs. You're doing a fine job on this important study area. Certainly, these two spectacular areas deserve wilderness status designation. I would, however, like to ask that you consider the Conservationist proposal of 241,011 acres for wilderness in the Paria/Vermillion area. I do feel that the area large and scenic wilderness potential and could be interpreted without the loss of historical resources.

Sincerely,

With the letter I would like to see record as

supporting your recommendation of 34,682 acres for Pinta and the Conservationist recommendation of 241,011 acres for Paria/Vermillion. It would also like to ask that you please do all you can to help these areas on their way to full wilderness designation.

Thank you

Chris Chmura
13242 Leroy Ave
Channahon, Ohio
44835

BLM Wilderness
P.O. Box 250
24. George, Utah 84770

Q. 3.1:

On October 1, 1941, the writer of this
report and four American citizens. The
report of these citizens was
the basis of the report. I suggest a 34, 1/2
cents for the first and a 24, 011 one for the second
American citizens were sent (1st 1-8/19).

Now cannot be the distance he can only
be well enough to put him in a new life
life. These three life is much as important to
the future as to the present for welfare
prosperity. I said that I am a part of the present
welfare of 34,452 is a good for the future/nation
also 24,011 also.

Kid, negro
 child E. T. Brown
 Dec 4 31 21 0-1 inch
 Monrovia, Liberia 55417

Coconino Sportsmen

P O BOX 1201
FLAGSTAFF ARIZONA 86001

-2-

action is deemed necessary for endangered wildlife species, and protection of the Maricao Monarch and Dominicus-Escalante trails; then the Virginian Hills Area not included in the proposed wilderness be removed rural area status and included in the Paris Wilderness, and this area continue to be managed in such a way, not on sound use, that existing water rights, riparian and improvements be allowed to continue. To protect wildlife and livestock.

We, therefore recommend, at this time, that the House urge Congress to accept alternative one of this proposal. This recommendation should also include the continuance of proper livestock grazing management, associated developments, and wildlife habitat improvement as long as these systems remain compatible with conservation measures and practices. Also, that all those areas deemed compatible as listed, Page 8-mutual-use conservation, be instituted, maintained, and encouraged. In the case that economical and recoverable oil deposits are located; oil runs is deemed vital to national interests; and lands in the proposed Willmar area holding such deposits are determined to be classification exempt, we request further study reports be written and filed in the public domain. Such input would be required and reviewed before any classification change or reclassification is recommended that any public lands not include lands in the Willmar area, as proposed, be not offered for trade or lease to be included therefore into Indian Reservation lands.

^a The number of subjects who were included in each group was 10.

88

P O BOX 1204
FLAGSTAFF ARIZONA 86001

JUN 17 10 27 PM '53

UNCLASSIFIED//FOR OFFICIAL USE ONLY

ADDITIONAL STRIP FILMED 17

5. The Colorado "Partners" did to provide better data and correct facts this report. At this time also, we did see that due to some misunderstanding with the land surveying boss, Pointe Wilderness is a submergence will be divorcing the proposed Pointe Wilderness Area and Karamellion Cliffs Area. However, we have no large objections as stated in to the Pointe Wilderness Plan except to emphasize the need since wildlife sub-mergence, that it is present and that it is, that we are in an area involved in a significant extent that is a very small amount of a country will be.

We believe that in the proposed Public Wild Areas Act, some lands as described are marginal for wilderness values. Therefore, some adverse impacts socially and economically may result from the inclusion of such marginal lands. Due to such impacts, we do not advocate alternative two, even though such provisions exist to include as much land as possible into wilderness classification. We feel that many areas under this proposal do not truly merit the "unique, scenic, and/or historical" classifications needed for inclusion.

But also to existing roadways, bridges, and livestock improvements the total wilderness difference is positive. Indeed, for "wilderness classifications" in most types of areas, and especially such classification, except with the proviso that it runs time upon

RECEIVED
JUL 15 1980

Southwest Resource Center
June Whalen
P. O. Box 11862 • 635-4804
Hurricane, L.I. 94737

89

89

B. L. M.

I strongly support 24,011 acres of wilderness in the Grand Vermilion Cliffs including units 1-6 & 1-8/10 and the 34,682 acres in Pinta. These units are some of the best, lots of Indian ruins, excellent hiking in the twisting narrow canyon system. The Vermilion Cliffs is the most spectacular and colorful escarpment of geological time. It is scenic beauty, I never cease to enjoy every time I drive from Jacob Lake to Marble Canyon.

2. *Quercus*,
Quercus

From: Secretary
to: Chairman
Date: 6/12/80

Dear Sirs,

I am writing to support the BLM recommendation of 34,682 acres of wilderness in the Painted Desert area, and the conservation of 34,011 acres of wilderness in the Grand Canyon and Vermilion Cliffs area. These areas are extremely deserving of wilderness protection as they would not have been recommended as private property in their natural state.

Sincerely,

Stuart Bengson

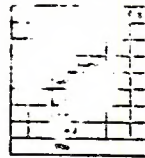
July 12, 1980

Dear Sirs,

I have long known of the magnificence of Painted Canyon, the Vermilion Cliffs and the Virgin Mountains but the pictures and descriptions in the proposal you sent me impressed me even more. I strongly support your proposal for a 34,682 acre Painted Wilderness Area encompassing the Virgin Mountains with range of country. I agree that the conservation Vermilion Cliffs and Painted Canyon should also be given wilderness status but also seeing your picture of adjacent wildlands with their varied rock formations and long mesas I have come to support the conservation of 34,011 acres proposal which includes these areas. If passed this plan will give our children a chance to see and enjoy nature as they have and give the wild places and animals of these lands a chance to keep living as they have for ages.

RECEIVED

JUL 17 '80



immediately from
John Harrison
4425 S. Buchanan Ave.
Chicago Illinois 60615

P.S. It was an excellent idea to include pictures in the recommendation for the designating the photographic money in support of an area for preservation, magnificence of scenery and should be included in future BLM material.

Stuart Bengson, Land-Use Chairman
6900 N. Linn St. Mesa, Tucson, AZ. 85704 297-4561

June 12, 1980

To: Mr. Claire Whitlock, State Director
Bureau of Land Management - BLM
2100 Valley View Center
Phoenix, AZ. 85075

ARIZONA STATE OFFICE
BLM LAND MANAGEMENT

JUN 30 1980

7:45 A.M.
PHOENIX, ARIZONA



Dear Sirs:

I would like to take this opportunity to reply to your proposed wilderness classification of the Paria Canyon, alpine, and Vermilion Cliffs areas. Although we are opposed to the closure of most public lands as wilderness we do recognize the need for protecting certain unique areas as wilderness. We do not oppose any wilderness proposals, only those that threaten our access to areas that we enjoy and those areas that have greater opportunities to offer also under a multiple-use management program.

The areas you are proposing for wilderness here, i.e. Paria Canyon, alpine, and Vermilion Cliffs, do offer some outstanding and unique wilderness qualities. Certain portions of these areas probably should be protected as wilderness. But, we do not see the need to encompass such a large area. Nor do we see the need to legislatively and permanently classify the areas as wilderness. Rather, we feel the area can best be enjoyed by more under a proper multiple-use management program. This would allow you, the professional resource manager, the flexibility to manage the resources to the optimum as they should be and to maximize the resource potential of the area. Certain portions of the area could be protected as wilderness while other resources of the area are developed and utilized. The time of critical resource shortages in this country it seems inconceivable, even treasonous, to reduce our resource base even further.

You mention in your summary of the impact statement and sustainability report the environmental consequences of this proposed wilderness action. Most all of these consequences are negative. You speak of lost wildlife & livestock water development potential, loss of mineral potential, increased vandalism of archeological treasures and reduced capability to manage and police the area, you speak of increased detrimental impacts to the area and the environment due to wilderness classification, and the loss of potential energy supply corridors.

It seems to me the negative aspects of your proposed wilderness classification outweigh your positive aspects. It is quite conceivable to me that you can responsibly endorse this wilderness proposal. As a trained, qualified resource professional how can you, in a clear conscience, endorse such an action? As a group, could like to see the area remain open to our use and as citizens and taxpayers of this state would like to see the resources of the area maintained under a multiple-use management program.

Thank you.

Sincerely,

Stuart Bengson

7-16-80

GENTLEMEN:
WISH TO URGES SUPPORT FOR
BLM WILDERNESS DESIGNATION OF
34,682 ACRES IN PAINTED AND 34,011
ACRES IN PARIA/VERMILION CLIFFS
WHICH INCLUDES UNITS 1-6, 1-8/19

SINCERELY
Margaret Y.
Kernick

ARIZONA STATE OFFICE BLM LAND MANAGEMENT	
DATE	7/16/80
TO	BLM
FROM	BLM
SUBJECT	BLM
REMARKS	BLM
APPROVED	BLM
SIGNATURE	BLM
DATE	BLM

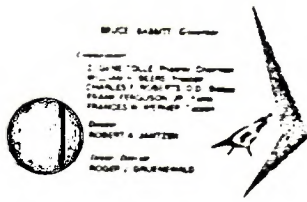
POST CARD

BLM Wilderness

Copy 350

at Chicago

47



ARIZONA GAME & FISH DEPARTMENT

2225 West Johnny Road Phoenix, Arizona 85023

July 24, 1980

Mr. Clair M. Whitlock, State Director
Arizona State Office
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85073

Re: Arizona Strip Wilderness
Draft EIS and Suitability
Report

Dear Mr. Whitlock:

The Arizona Game and Fish Department has reviewed the Arizona Strip Wilderness Draft Environmental Impact Statement (DES) and Suitability Report, and we wish to provide the following comments.

95-1 The Department supports the Bureau's Proposed Action to recommend for designation as wilderness certain lands on the Arizona Strip -- the approximate Piute Primitive Area, 22,285 acres of the Vermillion Cliffs Natural Area, and the Paria Canyon Primitive Area including certain contiguous lands, namely the Coyote Buttes and Thousand Pockets.

Furthermore, the Department supports the recommendation for continued proper management, including grazing systems and associated livestock developments and wildlife habitat improvements, as appropriate to maintain and enhance the area's plant and animal communities.

The necessity of protection for additional adjacent lands is questionable when considering the present low visitor use patterns. If future visitor use of adjacent lands begins to have a negative impact on specific resource areas on the Paria Plateau, it is felt that ORV restrictions within the specifically affected areas would

AN EQUAL OPPORTUNITY AGENCY

Mr. Clair M. Whitlock

-3-

July 24, 1980

list the Paria Canyon area before the Vermillion area. The comparison drawn here would lead an untrained reviewer to think that the Arizona Game and Fish Department is reestablishing and hunting an endangered species of sheep. A further discussion of bighorn follows in Item 5.

95-7 Item 5. Page 21; Table 3-2: Change the table title to "State and Federal Threatened and Endangered Species". Also, under "Birds", omit the snowy egret and the black-crowned night heron. These birds are, at best, occasional visitors to the Paria with no existing knowledge that this habitat is necessary to either species' existence. Recently, sightings of black hawk have occurred on the lower Paria River, however, no current data would indicate nesting pairs. Are these few black hawk sightings justification to list the species in this table? Another approach to this table would be to add an "occurrence" under your subheadings and use a code to indicate whether the species is resident, an occasional visitor, or rare in the wilderness areas.

Under mammals, omit bighorn sheep from the list. *Ovis montanus* is in fact listed in Arizona as a Group III species. Taxonomically, however, the *montanus* subspecies does not occur north of the Bill Williams River. *Ovis canadensis* is the likely subspecies historically occurring in the Piute, and for certain the sheep recently transplanted to the Piute from the Black Mountains are from the core of what is considered *canadensis* distribution. *montanus* are not on any list as threatened.

95-8 Item 6. Page 23: Recreation Uses, Hunting - Big Game: Should read, "Mule deer populations in the Paria Canyon and Paria Plateau are moderate in size and concentrated in areas of browse adjacent to the Paria River or stock waters. Hunter pressure and success has been moderate. The quality of the hunting experience is heightened by the remoteness of the area and the generally large size of the mule deer harvested".

The paragraph should include the evaluation on big game hunting given in Item 7.

95-9 Item 7. Page 14; Table 3-3: Change the ratings under "Hunting - Big Game" to "Good" for both the Paria Canyon and Paria

Mr. Clair M. Whitlock

-2-

July 24, 1980

allow for sufficient resource protection. Hunting access and opportunities would be greatly reduced by classifying as wilderness, lands adjacent to Paria Canyon and the Vermillion Cliffs on the Paria Plateau proper (Alternative 2).

Several errors were noted within the DES, as it pertains specifically to wildlife, hunter use patterns, and the importance of various game species within the proposed wilderness areas. The following is a comprehensive list of suggested corrections and information not included or addressed in the wildlife portions.

95-2 Item 1. Page 1, Environmental Consequences: The second sentence should read, "Some wildlife species could benefit from the increased habitat protected under the proposed action, and Alternatives 1 and 2, however, an increase in visitor use will cause a seasonal disturbance to some species whose habitats occur within the riparian zone along the Paria River".

95-3 To presume wilderness designation will automatically protect "animals", is not factual; also, what additional protection does alternative 1 and 2 offer "animals" over the proposed action? Are you presuming that additional acreage within the wilderness areas automatically gives habitat and its respective species protection? This is most certainly not true in the case of mule deer and range improvement projects.

95-4 Item 2. Page 2: Mitigating Measures: Limiting the season of use could impact big game hunting during state-restricted periods of harvest. Since hunting is a major use of the Arizona Strip, the Arizona Game and Fish Department would oppose restricting sportsman access during big game and trapping seasons.

95-5 Item 3. Page 18: Change the heading "Animals" to "Wildlife". "Animals" suggests feral species may be present in the proposed wilderness areas.

95-6 Item 4. Page 20: Change the heading "Threatened and Endangered Animals" to "State and Federal Threatened and Endangered Species". The second sentence under this heading is comparing peregrines, a federally endangered species, to bighorn sheep, a state-listed threatened species. Why is the Vermillion Cliffs area highlighted using these species? Our agency knows of no existing RMP calling for reintroduction of bighorn sheep to the Vermillion area. Should this occur, our priorities would certainly

Plataau. Strika the "NE and fair" ratings.

95-10 Item 8. Page 25; Column 1: Under the "visitor use" heading, 1975 information for the base of 702 visits or (522 visitor days) is mentioned. Using an estimate of 50 mule deer hunters multiplied by our data of 4.0 hunter days per hunter for 1976-1978, one arrives at a minimum of 200 visitor days for big game hunting alone. The paragraph is worded very well, but are there any more current visitor data than five years ago? Also, the figures of 702 visits further point out that adjacent lands under alternative 1 need not be included as wilderness, if present or projected use of these areas is a determining factor in wilderness designation.

95-11 Item 9. Page 25: Vermillion Cliffs, Recreation Uses: Hunting is not addressed. A subheading for "hunting" should be added and the following paragraph inserted. "Mule deer and small game populations are moderate in size on the Vermillion Cliffs, and are limited to areas near water immediately adjacent to the base of the cliffs. Hunting for mule deer does occur, however, the major emphasis is on small game hunting of dove and cottontails. The quality rating for this activity is fair".

95-12 Item 10. Page 27: Piute Primitive Area, Recreation Uses, Hunting: The first sentence is good. Omit the second sentence and insert, "The primitive area's rough topography and the ban on motorized travel limit the number of hunters equipped for using the area. It does provide an excellent opportunity for horseback and backpack big game hunting with a generally high hunter success."

Small game hunting and trapping is popular on the western boundary of the primitive area in the desert shrub zone, where viable populations of Gambel's quail, cottontail rabbits, and predators such as coyotes, bobcats, and grey foxes occur. A majority of these species are harvested by hunters walking up the many wash bottoms draining the west slope of the primitive area."

95-13 Item 11. Page 27: Piute Primitive Area, Recreation Uses, Visitor Use and Facilities: The last two sentences of the paragraph on the bighorn sheep enclosure should be omitted, and insert the following. "Transplanting of bighorn sheep to the enclosure was begun in November, 1979, by the Arizona Game and Fish Department. The enclosure will remain until wildlife specialists determine that a viable

July 24, 1980

bighorn sheep population is established in the Virgin Mountains".

95-14

12. Page 51: Proposed Action: The points brought out on range and wildlife management are well stated. We support these premises.

- Item 13. Page 52: Animals: This title should be "Wildlife". In the first sentence under this title, omit the word "animals" and use "wildlife". The last sentence under this heading should read, "Some species of wildlife may benefit by the protection of this habitat from future development".

Again, as pointed out in Item 1, one feels the premise is that more wilderness means more and better wildlife. This is not true and has been demonstrated time and again in the history of wildlife management; both for non game and game species.

95-15

- Item 14. Page 55: Paria Canyon, Hunting: The second sentence should read, "Although alternative 2 might not affect the quality of hunting, banning ORV use on 74,909 acres on the Paria Plateau may greatly reduce hunting opportunities".

95-16

- Item 15. Page 71: Paria Canyon Primitive Area, § 5. Wildlife: The sentence should read, "Continue to cooperate with the Arizona and Utah State wildlife agencies to determine how to increase opportunities for the viewing and harvesting of wildlife".

95-17

- Item 16. Page 72: Recreation K: When referring to "discouraging the use of horses or pack animals", and "take appropriate action", we would recommend seasonal restrictions on these activities, not a blanket closure to horse use. Horses and pack animals represent the only viable alternative to hunters using the Paria, in transporting kills from the canyon. In the future, should bighorn sheep be established in the Paria, harvest opportunities and logistics will be reduced to nil without the use of horses and pack animals. Visitor use peaks in May and June and restrictions may be needed during this time period. However, we would discourage restrictions on horse use during big game seasons.

95-18

- Item 17. Page 72: Palute Primitive Area, 4a: The second sentence should read "Increase opportunities for visitors to see, hear, or harvest a variety of wildlife species".

96

July 21, 1980

MLM, Wilderness
POB 250
St. George, Ut. 84770

I wish to voice my support of the BLM recommendation of 34,682 acres for wilderness in the Palute Primitive Area and the conservationist proposal of 241,011 acres for wilderness in Paria/Vermillion Cliffs.

These two areas seem to have exceptional qualities and I hope will be protected.

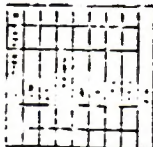
Sincerely,

Margie E. Johnson

Margie E. Johnson
Route 2, Box 300
River Falls, WI. 54022

RECEIVED

JUL 23 1980



July 24, 1980

95-19

- Item 18. Page 91: Hunting, Paragraph 2: The proper Department title is Arizona Game and Fish Department. In paragraph 3, the second sentence should read, "Hunting pressure on these species is moderate while hunt success has been high".

95-20

- Item 19. Page 91: Bird Watching: The inclusion of "bald eagles" in this paragraph, implies resident bald eagles occur in the Paiute. This is false.

95-21

- Item 20. Page 91: Sightseeing for Zoological Features, first paragraph: The last two sentences should read, "Mule deer, predators, and numerous small mammals occur in the pinyon-juniper, chaparral zone. The higher elevation ponderosa pine zone provides critical summer range for mule deer."

Second paragraph, second sentence: The proper title of the Department should be used.

95-22

- Item 21. Page 95: Bird Watching, second sentence: This sentence, as in Item 19, implies resident bald eagles. There is no evidence to suggest more than a winter migrant flying through any area on the Arizona Strip District.

In summary, the DES is weak in presenting wildlife values and their importance within the three proposed wilderness areas. In critically reviewing the draft, it is apparent that the wildlife input is broad-based with little working knowledge of the areas and their respective habitat types, associated species, and visitor use patterns affecting those species. The incorporation of our comments should help in clarifying wildlife values within the proposed wilderness areas.

The Department appreciates the opportunity to review and offer comments on the Arizona Strip Wilderness DES and Suitability Report.

Sincerely,

Robert A. Jantzen, Director

Robert A. Jantzen
Robert A. Jantzen
Habitat Evaluation Coordinator
Planning and Evaluation Branch

RKW:jw

cc: State Clearinghouse #80-80-0024

July 23, 1980

The Bureau of Land Management
Box 250
St. George, Utah 84770

Dear People:

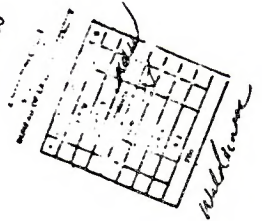
I support your recommendations on setting up the Paria Canyon/Vermillion Cliffs (including units 1-6 and 1-8/19) and 34,682 acres in the Piute Primitive Area as wilderness areas. It is important for the U.S. to preserve as much wilderness as possible for her people. We need for these areas to be protected because not everyone understands the importance of the wilderness areas. Please finalize these recommendations for these two areas as wilderness areas as soon as possible.

Sincerely,

Charlotte A. Sherick
Charlotte A. Sherick
2017 W. Meriday Ln.
Santa Ana, Ca 92706

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JUL 23 1980



98
Edward F. Newman
P.O. Box 250
St. George, UT 84770

RECEIVED
JUL 28 1980

FROM THE DIRECTOR
U.S. BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20250

Rev. Linda Myers
WILDERNESS
P.O. Box 250
St. George - UT- 84770

Re: Arizona Strip
Paria Canyon-Vermilion Cliffs
Plateau Primitive Area

Gentlemen,
I strongly recommend that you
designate the Full Wilderness
classification to:

241,011 acres in the Paria/Vermilion Cliffs
Area
34,682 acres in the Paria Area

It is imperative that this unique
and most isolated area in the contig-
uous U.S. be protected. Totally-
totally-permanently.
Yours truly,
Edward F. Newman

99

Dear Sirs,
As a frequent visitor to northern Arizona (southern
Utah area) I find the topography there unique and
very beautiful, also that the people there are very
friendly representative of the National Wilderness
Preservation System. Through I want to support BLM's
proposal of 34,682 acres of Paria Primitive Area as
wilderness. Also, concerning the Paria Canyon/Vermilion
Cliffs proposal, I support it (for the same reasons).
With mine of 241,011 acres - says Roy, it's good
work. Thank you, Michael Christ
21 Maple Ave
Chappaqua, NY 10514

100 July 28, 1980

101

BLM (Wilderness)
Box 250
St. George, UT 84770
Dear Sirs:

I am writing to express my strong support for
your recent wilderness recommendations for the
Vermilion Cliffs and Plateau and Paria Canyon. I favor
the recommendation to designate 34,682 acres in
Plateau as wilderness, but would prefer the Vermilion
Cliffs/Paria alternative recommended by the Sierra
Club - 241,011 acres - to BLM's current proposal
for only 192,535 acres. I hope you will advocate
Congressional approval of these new areas as soon as
possible.

Sincerely,
Dean Cady

RECEIVED

JUL 28 1980



Wilderness

Dean Cady
131 Franklin St.
Boston, MA 02134

Dear Mr. Whitlock,

The following are some comments on the Draft EIS
for Vermilion Cliffs Natural Area, Paria Primitive Area &
Plateau Primitive Area Wilderness proposals by the BLM.
As I have both worked and lived on the Arizona
strip I feel I have a good grasp of the issues
involved as well as a great deal of familiarity with
these areas mentioned above.

In many ways the draft EIS was admirable. The
photos were very well done and extremely helpful
in depicting the unusual qualities of these areas. I
was however, disappointed in the way in which the
Paria area was arbitrarily divided on political (with
boundaries for study and evaluation of the contiguous
lands. All the contiguous roadless area from Hwy 89
in Utah to Hwy 89A and from the House Rock Rd to
the Powerlines on Cedar Mt should have been
considered and evaluated together as there are many
unusual resources scientific, cultural & recreational.
The opportunities for solitude in a wild and pristine landscape
are without any doubt outstanding throughout this entire
area (including next to highway itself). I have seen the
proposals by the Paria Resource Council for a Paria Wilderness
Area which includes most of the U.C.B. Natural Area, the
Paria Primitive Area and most importantly these contiguous
lands which are roadless. I have been in Thousand Peaks,
Coyote Butte, Clark Butte, White Butte & Ponderosa Mountain Areas
and have found all of these areas as outstanding as the better
known Primitive & Natural Areas. I would have to agree

with the FRC. proposed and evaluation of these lands. 100% (though they failed to mention Lake Arch in W. Creek beds). The variety of shrub, sand and vegetation in these areas has never ceased to amaze me. One can observe their prints, ruins (petroglyphs throughout most of the area) as well as enjoy the presence of interesting wildlife. It is probable 20 or more golden eagles in my visits to the Paria area. Vermilion Cliffs, Paria Canyon and the surrounding Plateau also contain interesting fossils (incl. vertebrates & birds) and other geological features (continuation of the Eocene, Vermilion fault zone, rhyolite, clay exposures of formations from Cenozoic to Paleozoic, including trilobites, corals, etc.). Again I should like to emphasize the spacious solitude & "Mesozoic" views of the Plateau country & Lake Arch. As far as recreational opportunity, the whole area is a "playground". I have done one such climb a few miles inside Paria Canyon and hope to do a "big wall" style climb to the top of Vermilion cliffs above Soap Creek as soon as the weather cools off this year. I hope that you will enlarge the scope of your proposals ~~including~~ along the lines of the Paria Resource Council's proposals including their suggestions to allow reasonable access to permittees. This proposal should do a lot towards accommodating both wilderness and ranching interests, perhaps creating a better understanding between both interests and relieving some of the tension between these groups.

I should like to suggest that no amount of public money (if there were any available) could protect the archeological resources so well as official Wilderness designation. I have known many archeologists, most of whom are of the opinion that Wilderness protection is the best in most cases so long as the archeological resource is not emphasized as to attract hot hunters etc., such as was done

in the Grand Gulch Primitive Area of S. Utah. prohibiting vehicular access ~~to the~~ by Wilderness designations would do a lot towards stemming the already occurring damage on the Paria Plateau.

With reference to the Paria Primitive Area, I think you folks did a good job in your descriptions & recommendations. Unique areas such as the Virgin Mts, Paria Plateau, head Creek, the Vintorets etc. certainly deserve this sort of protection.

Thank you for your time,

Michael J. Von Noto
40 Big Springs Field Sta.
U.S.F.S.
Fredonia, Ar.
86022

P.S. Sorry about the sloppy writing but you know how these pens are! If I can be of further assistance, please feel free to contact me.

102

July 26, 1980

BLM, Wilderness
P.O. Box 250
St. George, Utah 84770

Gentlemen:-

We are writing to SUPPORT the BLM Recommendation of 34,682 Acres for Wilderness in Paria, and the Conservationist Proposal of 241,011 acres for Wilderness in PARIA/VERMILION CLIFFS (including units 1-6 and 1-8/19).

Thank you for your efforts in having these deserving areas added to the National Wilderness Preservation System.

Yours very truly,

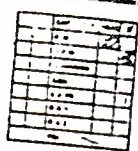
J. N. Kelly
John N. Kelly

1811 Warwick Ave - 29-W

Warwick R 1 02829

RECEIVED

JUL 31 1980



copy

103 Route 1, Box 250
Stanton, Virginia 24401
Aug 4, 1980

US BLM

W. Noto

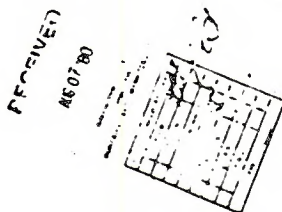
P.O. Box 250

57 George Utah 84770

Good People:

I would like to give my most enthusiastic support for your recommendation of a 34,682 acre Paria Wilderness in Arizona. I would also like to support the conservationists proposal for 241,011 acre Paria/Vermilion Cliffs Wilderness.

Sincerely yours
Ruth F. Mueller
Ruth F. Mueller



MAY 30 1980

7:45 A.M.
PHOENIX, ARIZONA

6341 E. Valley Bank Center

Phoenix, AZ 85073

May 23, 1980



Dear Mr. Director:

I am writing to you regarding the

Wilderness Study Area.

I am writing to you regarding the

Wilderness Study Area.

I am writing to you regarding the

Wilderness Study Area.

I am writing to you regarding the

Wilderness Study Area.

I am writing to you regarding the

Wilderness Study Area.

I am writing to you regarding the

Sincerely,
Lisa J. Boring

Mr. Clair M. Whitlock, Director
Arizona State Office
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85073

I am writing pursuant to the hearing held in May on the Environmental Impact Statement and Suitability Report for the Paria Canyon Primitive Area, including the Vermillion Cliffs and the Paiute Primitive Area. Having read this document and attended the hearing I make the following recommendations.

I support the Wilderness designation recommendation for Paiute Primitive Area and Paria Primitive Area.

I support a Wilderness designation for all of the Vermillion Cliffs Natural Area (rather than only a portion of it which is what Alternatives 1 and 2 propose, while the Proposed Action Alternative proposes the entire Natural Area).

I commend BLM for recognizing the importance of the Coyote Buttes area and urge the agency to include in their Paria Wilderness proposal all of Intensive Inventory Unit 108, and all qualifying lands on the Paria Plateau, the West Clark Bench, and in the Ferry Swales area.

My compliments to the Bureau for the excellent quality of this Environmental document.

Sincerely yours,

Barbara Holaday
Barbara M. Holaday

1413 East Dobbins Road
Phoenix, Arizona 85040

JUL 1 1980
PHOENIX, ARIZ.

107

August 22, 1980
914 Cordona Ave.
Reno, NV. 89502

Arizona State Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Ariz. 85073
Subject: Arizona Strip Wilderness EIS

AUG 25 1980

7:45 A.M.
PHOENIX, ARIZONA

Dear Mr. Director:

I encourage the acceptance of the 'Recommendation and Study Area Summary' as stated in the EIS for the Arizona Strip Wilderness. The 'Recommendation' closely follows the, 'Alternative 2' wilderness plan, which prevents the intrusion of vehicles in the Paria Canyon Area (especially the Coyote Buttes), so that the Wilderness character of these places are not jeopardized.

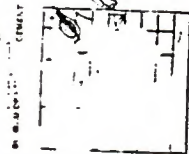
Additionally the Vermillion Cliffs are protected, preventing future degradation which would have substantial casual impact.

I disagree with the premise that the impact of additional hikers will have an adverse effect on this area. With proper management and awareness the wilderness character of the Arizona Strip will be preserved for future generations.

Yours truly,
D. W. Smith

RECEIVED

AUG 13 1980



Wilderness Coordinator
Bureau of Land Management
P.O. Box 250
St. George, Utah 84770

106

227-D Spring Creek Dr.
Laramie, WY. 82070
Aug. 9, 1980

Dear Sir:

I am writing to ask you to increase the size of the Paria-Hackberry Wilderness Study Area. I feel the current size of the study area is too limited considering the natural values present.

The Paria was the first "alickrock" canyon I ever hiked. It hooked me with an irresistible fascination for hiking it and other alickrock canyons. It is doubly memorable because the ease with which it can be hiked (and despoiled by the likes of the lawless county commissioners in Grand Co.) enabled me to take my sisters on their first backpacking trip. Pictures I took in the Rive of the Buckskin have stimulated friends to start their own love affairs with alickrock canyons, usually beginning with the Paria.

The Paria has a marvelous Eden-like atmosphere which must be preserved to serve as a remnant fragment of the vast alickrock canyons which existed before their despoiling by the Glen Canyon Dam, L.A. Chamber of Commerce, and the WAPRS (they may change their name, but their sins live forever).

Even though preserving the Paria does not require economic justification (ahhh, if only wilderness advocates were so unconcerned as to rewrite the laws of economics to serve their own purposes as their adversaries have), you may be interested to learn what economic impact the Paria has had among my friends. One group of friends came from the Midwest, the other came all the way from West Virginia. Both groups drove and spent nearly \$500 on gas, \$150 on food, \$150 on lodging, and \$100 to replace tennis shoes worn out in the Paria. Contrary to popular myth, backpackers do change their clothes and money.

While we do not garner the headlines like the greenheads behind the sagebrush rebellion (why dignify it with capital letters), there are some westerners like myself who are perfectly content to let you lovely old bureaucrats from Washington (if so many of you come from Washington, then there are still so many people left) manage our land. Only a person who still argues about wilderness looking up land, so please manage for the nation, manage for us - the nation. Arguments never led before, so don't start trying to buy time and favor with the local socialist fringe elements in your districts by sacrificing any more wilderness.

Sincerely,

Brian & Litter Mind



United States Department of the Interior

NATIONAL PARK SERVICE

WESTERN REGION

400 GOLDEN GATE AVENUE BOX 14003
SAN FRANCISCO CALIFORNIA 94102

August 25, 1980

APPROPRIATE OFFICE	
BY LAND MANAGEMENT	
AUG 28 '80	
TO:	
FROM:	
SUBJECT:	
DATE:	
TIME:	
BY:	
FOR:	

108-4 Page 28. Government Controls and Constraints. This section should be expanded to include the relationship of the proposed wilderness areas with National Park Service land; specifically the relationship with Glen Canyon National Recreation Area.

We appreciate the opportunity to review and comment on this document. We wish the Bureau of Land Management well in its management efforts.

Samuel S. D. Smith

Memorandum

To: State Director, Bureau of Land Management, Phoenix, Arizona

From: ^{NOTING} Associate Regional Director, Resource Management and Planning, Western Region

Subject: Review of Arizona Strip Wilderness draft environmental impact statement and suitability report.

We support the proposed wilderness designation for the Paria Canyon and Paiute Canyon Primitive Areas and the Vermilion Cliffs Natural Area in the subject document. We have the following specific comments on the draft environmental impact statement (DES) that should be considered when developing the final document.

108-1 Page 6 Interrelationships. This section should be updated to reflect current legal decisions regarding the Navajo Land Act. In addition, reference should be made to the fact that one potential wilderness area is bordered by Glen Canyon National Recreation Area. The DES should relate the benefits and adversities of this fact.

108-2 Plate 1 illustrates that potential wilderness for the Vermilion Cliffs Natural Area overlaps Glen Canyon National Recreation Area by approximately five square miles in T20N, R7E within all or portions of sections 33, 28, 22, 21, 15, 14 and 11. During the Glen Canyon Wilderness study, it was determined that Bureau of Land Management primitive and outstanding natural areas covering land now included within the recreation area were superceded by the passage of Public Law 92-593, establishing Glen Canyon National Recreation Area. Consequently, the National Park Service final wilderness proposal now being reviewed by the Department of the Interior does not agree with the lands proposed by the subject report. The map should be corrected accordingly.

108-3 Page 15 Air Quality. The document should be revised to reflect that Paria Primitive Area and Paiute Primitive Area have been recommended for Class I by the Secretary of the Interior. These recommendations were published in the Federal Register, June 23, 1980, Volume 45, Number 128. Other sections of the document dealing with air quality should also be modified to reflect this recommendation.

Year of the Visitor

RECEIVED

United States Department of the Interior

NATIONAL PARK SERVICE

Glen Canyon National Recreation Area

Box 1507

Page, Arizona 86040

May 9, 1980

MAY 12 '80



BY AIR MAIL TO:
L32
X17617

APPROPRIATE OFFICE	
BY LAND MANAGEMENT	
MAY 12 '80	
TO:	
FROM:	
SUBJECT:	
DATE:	
TIME:	
BY:	
FOR:	

Memorandum

To: District Manager, Arizona Strip District Office

From: Superintendent, Glen Canyon National Recreation Area

Subject: Review of Arizona Strip Wilderness DES

We have reviewed the subject document and offer the following comments:

109-1 We note that Plate-1 shows the Wilderness Study area overlapping the recreation area in T20N, R7E within all or portions of sections 33, 28, 22, 21, 15, 14 and 11. During the Glen Canyon Wilderness Study, it was determined that Bureau of Land Management primitive and outstanding natural areas that occupied land now included within the recreation area were superceded by the passage of Public Law 92-593, establishing the Glen Canyon National Recreation Area. Consequently, the National Park Service's final wilderness proposal now being reviewed by the Department of Interior is not coincident with the lands proposed by the Bureau of Land Management.

As the surface managing agency, we feel it inappropriate to have approximately 3,040 acres of Glen Canyon lands included in the Bureau of Land Management proposal.

109-2 P.6. Interrelationships - It would appear that the adjacent Glen Canyon Wilderness Proposal would appropriately be discussed in this section inasmuch as the two areas are complementary.

109-3 P.16. Minerals - The El Pequito Mine lies within the Glen Canyon National Recreation Area wilderness proposal. There are no valid mining claims located within the Paria-Lees Ferry District of the recreation area nor is the area open to mineral entry. While mineralization may occur at the El Pequito location, its presence is immaterial in this instance.

109-4 P.20. Animals, Paria Canyon - We wholly agree that the diversity of the riparian zone is a key factor in the canyon's ecology but suggest that four species of birds do not represent that diversity to the reader. The presence of mule deer, beaver, peregrine falcon and razor back sucker are documented within the canyon/river system.

109-5 P.20. T/E Animals - The Paria Canyon not only provides habitat but supports reproducing populations of these T/E species. It seems important to point out that not only are the conditions conducive to the welfare of these species present but that the area is occupied by living, breathing members of wildlife species whose existence has been rendered in jeopardy or even extirpated in its former range.

P.20. Cultural Resources - Wilderness designation may, unfortunately act to draw people in search of a remote, backcountry recreation opportunity. Cultural resources tend to suffer from unintentional and/or wanton destruction in the face of any of man's activities. Archaic features appear to be the ones most likely to suffer accidental damage since they are not readily identified by ceramics, structural features or other easily identified resources commonly associated with more recent puebloan sites. We urge an archaeological inventory, site recordation and public awareness effort to mitigate the increase in use. Benign management "limited to conservation and preservation uses" will ensure the loss of many cultural resources prior to their ever coming before the scientific community.

109-6 P.30. The boundary for Glen Canyon National Recreation Area is incorrectly portrayed on map 3-1. A current boundary map is enclosed.

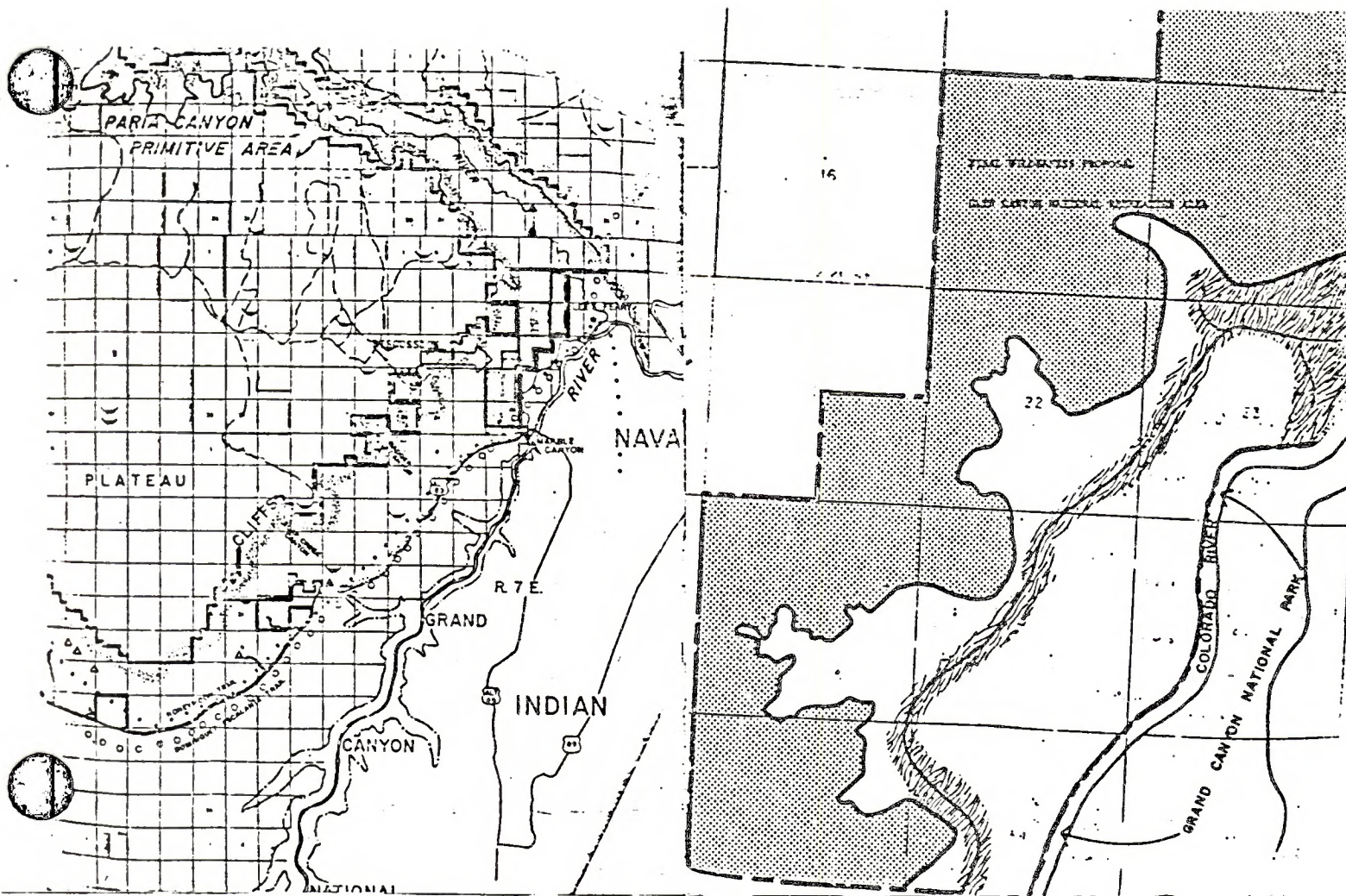
Thank you for the opportunity to comment.

Bryan Harry
G. Bryan Harry

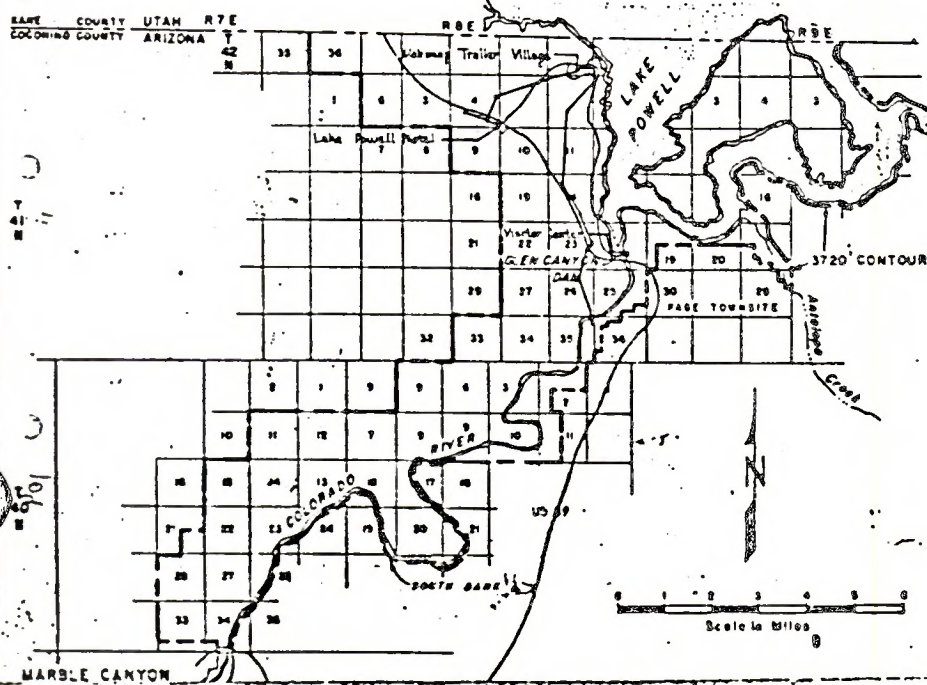
Enclosures

cc:
Regional Director, RMR

WRS/gkh



DETAIL OF BOUNDARY IN VICINITY OF PAGE, ARIZONA



110

9-24-80

Dear BLM

Hope it is not too late to comment on some of your wilderness proposals.

Please consider this a note in favor of your recommendation of withdrawal for 34,682 acres in the Paria Canyon and Vermilion Cliffs area and especially a note in favor of wilderness for 241,011 acres in the Paria Canyon and Vermilion Cliffs area.

Thank you.

W. J. Davis
P.O. Box 267
Escalante, UT 84820

RESPONSES TO WRITTEN COMMENTS

- 1-1 - See Introduction to final EIS.
- 1-2 - Although it is difficult to determine an area's carrying capacity, managers will monitor visitor use to prevent exceeding the carrying capacities of the areas.
- 2-1 - See Introduction to final EIS.
- 3-1 Restrictions on exploration for the areas that may be designated as wilderness would have little or no effect on the balance of the District.
- 3-2 - See Introduction to final EIS.
- 4-1 - See Introduction to final EIS.
- 5-1 - The possibility for mineral development in these areas does exist. According to Bureau of Mines and Geological Survey reports, the likelihood or probability of economic development is low.
- 9-1 - See Introduction to final EIS.
- 10-1 - See Introduction to final EIS.
- 11-1 - See Introduction to final EIS.
- 11-2 - See Introduction to final EIS.
- 11-3 - For the following reasons we are not working on wilderness management plans (1) we have no assurance the areas will become wilderness, (2) the draft wilderness management policy was published January 16, 1981 and has not been made final; and (3) Paria Canyon and the Paiute Primitive areas have recreation plans, and the Vermillion Cliffs Natural Area is included in a management framework plan. These documents meet the current management needs.
- 12-1 - See Introduction to final EIS.
- 14-1 - See introduction to final EIS.
- 14-2 - The sections on sightseeing and primitive values are statements of environmental consequences for two different qualities present in the Paria Canyon. Those consequences do not have to be consistent with each other. Close examination of them shows the consequences are similar, that they are slight for sightseeing, and that they are insignificant for primitive values.
- 14-3 - BLM, as well as the Secretary of the Interior and Congress, will consider these issues before making any recommendations or final decisions.

- 15-1 - See Introduction to final EIS.
- 16-1 - See Introduction to final EIS.
- 17-1 - See Introduction to final EIS.
- 21-1 - See Introduction to final EIS.
- 22-2 - Environmental impact statements for Wilderness designations differ from those dealing with a proposed BLM undertaking as defined in the Advisory Council's regulations (36 CFR 800.2(c)). Under Section 603 of the Federal Land Policy and Management Act of 1976 (FLPMA) (Pub. L. 94-579, 90 Stat. 2743, 43 U.S.C. 1782), the Secretary of the Interior must review lands administered by BLM to determine their suitability for preservation as wilderness. The inventory, study, and preparation of recommendations to Congress has been delegated to BLM and is to be completed by 1991. As a more immediate issue, FLPMA directs that lands formally identified before November 1, 1975 as natural or primitive areas be studied on an accelerated schedule, and recommendations on their wilderness suitability be forwarded to the President by July 1, 1980. The President then makes recommendations to Congress; only Congress can designate areas recommended to it as wilderness.

The Act states at Section 603(c) that:

During the period of review of such areas and until Congress has determined otherwise, the Secretary shall continue to manage such lands...in a manner so as not to impair the suitability of such areas for preservation as wilderness...

This passage and additional amplifying language have been accepted by BLM as a "special management" mandate, which sets lands under wilderness suitability study apart from other BLM-administered lands in several ways. Under BLM's Interim Management Policy, areas not dropped from consideration automatically stand exempt from uses that would permanently impair wilderness suitability.

Since passage of FLPMA, all BLM lands have been under nonimpairing interim management until the absence of wilderness characteristics has been demonstrated through the inventory and evaluation process. Areas determined by the Secretary and the President to have wilderness characteristics will, by law, remain under interim management until Congress determines whether they will be added to the National Wilderness Preservation System.

Once Congress makes its determinations, areas not included in the wilderness system will most likely revert to multiple-use management. Areas accepted into the wilderness system will be subject to wilderness management plans to be developed after congressional designation.

Under these conditions, we believe that a BLM finding that an area has wilderness characteristics and a BLM recommendation that Congress

consider adding the area to the wilderness system do not constitute an undertaking as defined at 36 CFR 800.2(c)(4) and are, therefore, not subject to compliance with Section 106 of the Historic Preservation Act of 1966. An affirmative finding and recommendation do not change the management of an area, nor is the nature of that management a matter of discretion. We believe that the appropriate point for Section 106 compliance would be after congressional designation and before approval of a wilderness management plan. Only then would an undertaking be proposed.

Scoping meetings held before preparing the draft EIS did not identify cultural resource concerns among significant issues (draft EIS: Section 2, pp. 11-12). Protection of cultural resources was added by BLM as an issue to be addressed. The major potential environmental effects of wilderness designation were determined to relate to a possible increase in visitor use and vandalism to cultural resources, and to the inability to use motor vehicles to protect cultural resources.

The two primitive areas have been closed to motorized vehicles since designation, and the natural area is inaccessible to motorized vehicles by its nature. A change to wilderness status would thus not change the accessibility of motorized vehicles to cultural resources in the areas. They would become more accessible only if current management restrictions are withdrawn, which is not contemplated.

Your specific comments show concern for (1) a plan for avoiding or mitigating adverse effects to identified and unidentified cultural resources; (2) a procedure to be followed to prevent wildfire from threatening significant standing historic cultural properties; (3) mechanisms for permitting scientific research; and (4) provisions for stabilizing or protecting significant cultural properties. Our responses follow the same order.

- (1) As discussed above, we do not believe that there is an undertaking involved that would call for such a plan; BLM policy, which parallels and supports the Advisory Council's regulations, would apply in any case where an undertaking might be proposed. Areas that have not received Class II inventory (BLM Manual 8111.13) will be inventoried as we cycle into preparation of resource management plans (general land-use plans). The existing management framework plans (to be superseded by resource management plans) provide adequate direction for the protection of cultural resources in the face of possible conflicting use.
- (2) Wilderness designation would not significantly affect fire management policies and plans for the areas in question. No significant standing historic cultural properties exist in either Paria Canyon Primitive Area or Vermillion Cliffs Natural Area, and no known, suspected, or anticipated properties of that kind exist in the Paiute Primitive Area.

- (3) Scientific research consistent with BLM's cultural resource use allocations would be permitted as long as it could be conducted without relying on motorized equipment. This situation applies at present and would continue under wilderness designation.
- (4) Stabilization projects or protection facilities would not be barred by wilderness designation, but the same constraints as for scientific research do and would apply.

Some cultural resource advocates who criticize Federal management of wilderness believe or fear that traces of past human occupancy or use are slated for obliteration so as to enhance the naturalness of an area. Cultural resources on all lands managed by BLM, whether natural area, primitive area, wilderness, or other, will be protected to the best of our ability.

Should BLM's proposed recommendation for inclusion of the Paria, Vermillion, and Paiute areas in the wilderness system be approved by Congress, we will be contacting you for your Section 106 review comments once a plan for wilderness management has been drafted.

- 23-1 - See Introduction to final EIS.
- 25-1 - See Introduction to final EIS.
- 26-1 - See Introduction to final EIS.
- 27-1 - See Introduction to final EIS.
- 28-1 - See Introduction to final EIS.
- 29-1 - See Introduction to final EIS.
- 32-1 - Although it is difficult to determine an area's carrying capacity, managers will monitor visitor use to prevent exceeding the carrying capacities of the areas.
- 32-2 - It is regrettable that a hearing was not scheduled in Flagstaff and Kingman on the first go around, but you can be assured the BLM is interested in your opinions in this matter.
- 32-3 - The ESA is defined on page 29 and also shown on map 3-1, page 30.
- 32-4 - Flagstaff and the Navajo and Hopi Reservations are not part of the Environmental Study Area (ESA). Interviews were conducted with residents in all four counties in the ESA (Washington and Kane Counties, Utah and Mohave and Coconino Counties, Arizona).
- 32-5 - The Indian Claims Commission has legally determined that the area is the traditional homeland of the Kaibab Paiutes based on the basis of the determination that it does contain sacred areas, plants, and animals.

30 - See comment 4.

31 - Additional information on the support of or opposition to wilderness designation would not significantly alter the conclusions stated in the section on environmental consequences.

32 - This comment is covered under the new description of alternative 3 on page 6 of the draft EIS. The statement about returning the area to multiple use should also be removed as shown on the accompanying page. The area is now under multiple use management.

33 - See comment 4.

34 - The Wilderness Act of 1964 allows livestock grazing to continue. The Federal Land Policy and Management Act of 1976, however, allows livestock grazing to be continued "in the manner and degree in which the same was being conducted on the date of approval of this act (1976)". The maintenance or replacement of watering facilities, which requires heavy equipment, can be done; but where that replacement (or maintenance) would impair wilderness suitability, it can be stopped or prevented. The "manner and degree" is left to local authorities to determine, and all possibilities considered, maintenance and replacement of facilities could be prohibited. This is what's discussed on page 57.

35 - Although the document could have been expanded to include additional information on the social research design and methodology, the CEQ Regulations indicate that the descriptions of the affected environment "shall be no longer than is necessary to understand the effects of the alternatives" (Part 1502.15).

36 - The public comment period is not designed to "elicit public response to BLM's proposal." According to the CEQ Regulations, public comments shall "be as specific as possible and may address either the adequacy of the statement or the merits of the alternatives discussed or both" (Part 1503.3).

37 - See description of Alternative 1 in the final EIS.

32-6 - See response to 32-2.

32-7 - Interviews were conducted with residents in the portions of each of the four counties in the Environmental Study Area (ESA).

32-8 - See Introduction to final EIS.

34-1 - See Introduction to final EIS.

35-1 - See Introduction to final EIS.

37-1 - See Introduction to final EIS.

38-1 - Alternative 3--the No Action Alternative--is outlined as BLM understands the provisions of the Federal Land Policy and Management Act as it applies to wilderness review.

38-2 - See response to comment 1-2.

38-3 - The impact is based on the belief that wilderness designation would concentrate visitors in previously unvisited areas, creating the potential for an increase in vandalism.

38-4 - A copy of the Wilderness Act is printed with this final EIS.

38-5 - See Introduction to final EIS.

38-6 - Pearson.

38-7 - See Introduction to final EIS.

38-8 - Designating only part of the contiguous lands will not preclude similar action on other contiguous lands. All contiguous lands not designated but identified as Wilderness Study Areas (WSAs) 1-6A, 1-6B, 1-6C, 1-6D, 1-8A/19, and 1-8B will be studied further preparatory to a later recommendation on their wilderness suitability. The western portion of the Vermillion Cliffs Natural Area identified for further planning will be considered with contiguous WSA's to determine the entire roadless areas's suitability for designation.

39-1 - BLM is also concerned about the lack of surveys and special studies, but we have no funds for either Class I or Class II inventories.

39-2 - No significant paleontological resources have been found in the Arizona Strip District. Planning is in progress for an inventory to be conducted by U.S. Geological Survey. Once the inventory is completed, controls can be proposed.

41-1 - See Introduction to final EIS.

44-1 - See Introduction to final EIS.

- 41
- 45-1 - See Introduction to final EIS.
 - 45-2 - Wilderness designation might adversely affect further exploration in these areas, but this is a value judgement that has to be made with the final decision.
 - 46-1 - See Introduction to final EIS.
 - 47-1 - See Introduction to final EIS.
 - 67-1 - See response to comment 38-3.
 - 67-2 - See comment 1-2.
 - 67-3 - Regulations set forth by the Council on Environmental Quality indicate that the focus of description and analysis should be on the significance of "effects in the locale" in this type of Environmental Impact Statement. Flagstaff is not one of the cities within the BLM Arizona Strip District public land administrative region (40 CFR, 1508.27).
 - 67-4 - See Introduction to final EIS.
 - 67-5 - The comment refers to the report of the preliminary finding of wilderness characteristics for the primitive area and contiguous roadless areas in Utah. This report was published as Appendix 2 to the draft EIS and is not subject to environmental statement comment. The wilderness characteristics inventory proposal was published and a 30-day public comment period announced in the June 21, 1979 Federal Register. The Utah State Director's inventory decision was announced in the August 31, 1979 Federal Register. The inventory was the equivalent of an intensive inventory and conducted in accord with the intensive inventory procedures described in the Wilderness Inventory Handbook (OAD 78-61). Change 3 of Organic Act Directive 78-61 is dated July 12, 1979 and was issued to District Offices in Utah on August 7, 1979. The inventory was thus conducted before the initiation of the Change 3 policy.

The inventory was consistent with the Wilderness Inventory Handbook procedures. Use of these procedures was mandated by the September 20, 1978 Instant Study Area Review Policy (OAD 79-60). These procedures state that the area with wilderness characteristics must at least contain naturalness and one of the remaining two wilderness characteristics. Several comments stated that the maps of each characteristic were helpful to the public. To eliminate subjectivity, the report states that the standards for outstanding opportunities were determined by what the current visitors to the primitive area considered outstanding. Visitor register comments and observed use patterns were used to establish these standards. The maps on pages 87 and 88 show that outstanding opportunities were identified on the benchlands above the canyons.

- 95-1 - See Introduction to final EIS.
- 96

95-2 - Agreement, the human disturbance of wildlife species is well documented, especially for bighorn sheep. An increase in visitor use in the three identified areas would increase the frequency of wildlife-human encounters and thus negatively impact various species.

95-3 - If in fact the identified areas are designated wilderness, later mineral withdrawal would benefit the habitat as well as species. Likewise, restricting road building within these areas should reduce disturbance and habitat removal for numerous wildlife species, including mule deer. Wilderness designation perse does not ensure protection. The later restrictions on mining, road building, and range improvement projects would.

95-4 - The objective in limiting season of use or party size in Paria Canyon is to maintain the integrity of the canyon environment, not to restrict hunter access. Some limit on party size could be necessary if visitor use continues to increase. Season of use restrictions, however, are not anticipated in the near future.

95-5 - We agree. This suggestion will be incorporated.

95-6 - The heading will be changed to "State and Federal Threatened and Endangered Wildlife". This paragraph will be reworded to differentiate between State and Federal listed species as recommended. The Vermillion Cliffs-Paria Canyon complex were historically occupied by both the peregrine falcon and the desert bighorn sheep. A peregrine eyrie is suspected to be active in this area. Under BLM contract Mr. Dave Ellis analyzed potential peregrine habitat within the Arizona Strip in 1979. According to Ellis this area is prime peregrine nesting habitat. The inventory phase for the Paria Canyon-Kanab Creek Habitat Management Plan will begin in 1981. The featured species for these areas are bighorn sheep and mule deer. The decision to reestablish bighorn sheep will be determined through the HMP process jointly by AG & FD and BLM. BLM is committed to encourage the reestablishment of extirpated populations on public lands.

95-7 - Table 3-2 will be changed to "State and Federal Threatened and Endangered Wildlife".

The Arizona Strip District's policy on identifying State-listed species in an area is based solely on presence or absence. No judgement is made as to whether the species' habitat is crucial to its existence. The main reason to list these species even if they are only occasionally visitors is to document their presence and to ensure their consideration in the planning process. According to our information, population data does not exist for the snowy egret, black-crowned night heron, and black hawk.

95-8 - Change made in final EIS.

95-9 - Changes made in final EIS.

- 95-10 - We lack comprehensive visitor use data for the Paria Plateau due to it's remoteness and inaccessability. The 1975 figure, although below estimated present use, is the only actual yearly use data we have.

We question the yearly estimate of 200 visitor days for big-game hunting on the plateau. On opening weekend of the 1980 season, BLM crews documented only 18 visitor use days from Friday through Sunday night. Ranchers reported a decline in hunting pressure after that weekend.

Wilderness suitability does not depend on present or potential visitor use. Visitor use only supplements the wilderness qualities of size, naturalness, manageability, along with opportunities for solitude and primitive/unconfined recreation.

- 95-11 - Addition made in final EIS.

- 95-12 - Addition made in final EIS.

- 95-13 - Addition made in final EIS.

- 95-14 - The proper title of this section is "Animals". The second portion of this comment has been changed in the final EIS.

- 95-15 - Change has been made in final EIS.

- 95-16 - Change has been made in final EIS.

- 95-17 - Change has been made in final EIS.

- 95-18 - Change has been made in final EIS.

- 95-19- BLM acknowledges these comments and finds them valid. They will be used
22 - in further considerations but due to the difficulties of making the changes will not appear in the final EIS.

- 108-1 - The Navajo Land Act no longer affects the Paria Plateau as of July 1980.

The existence of the Glen Canyon National Recreation Area protects the natural integrity and provides trailhead facilities for the lower end of Paria Canyon.

- 108-2 - See final EIS and enclosed map.

- 108-3 - See final EIS.

- 109-1 - See final EIS and enclosed map.

- 109-2 - The National Park Service has identified 6,180 acres contiguous to Paria Canyon Primitive Area as having wilderness potential. At this writing, the proposal is being reviewed by the Director of the National Park Service before being sent to the Secretary of the Interior.

109-3 - The El Pequito Mine was mentioned only to show mineralization of the area. Even though it is not within the proposed designation of this report, it shows an analogous condition.

109-4 - Table 3-2 lists the peregrine falcon and razor-back sucker as being documented in Paria Canyon. The number of species are shown in the narrative section. The four songbirds were listed to emphasize the importance of nongame birds in general. The presence of mule deer was brought out in the Land Use section under recreation. The presence of beaver was overlooked and will be added.

109-5 - That these species are State and Federally listed denotes the importance of maintaining viable population levels.

109-6 - See the final EIS and enclosed map.